Lime Down
Solar Park

The Applicant's Response to the Examining Authority's Second Written Questions

August 2026

Revision 1

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1 Introduction

1.1 Purpose of the Document

1.1.1 This report sets out the Applicant's response to the Examining Authority's (ExA) second written questions, issued on 27 July 2026 **[PD-014]**.

1.2 Structure of the Report

1.2.1 Section 2 of this report is tabulated to include the ExA's questions and a response to each question as follows:

- Air Quality and Emissions
- Assessment of Alternatives
- Compulsory Acquisition and Land Rights
- Climate Change
- Cultural Heritage
- Cumulative Effects
- Draft Development Consent Order
- Ecology and Biodiversity
- Flood Risk, Hydrology and Water Resources
- General and Cross-Topic Questions
- Habitats Regulations Assessment
- Health and Wellbeing
- Landscape and Visual
- Land Use, Soils and Food Security
- Noise and Vibration
- Socio-Economics
- Transportation, Traffic and Highway Safety

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Lime Down Solar Park.

1.2.3 Revision suffixes have also been attached to any documents which have been revised and resubmitted to the Planning Inspectorate during the Examination.

Table 1-1 List of Acronyms

Acronym	Document
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
BSMP	Battery Safety Management Plan
CEMP	Construction Environmental Management Plan
CNL	Cotswolds National Landscape
CR	Consultation Report
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DS	Decommissioning Strategy
EIA	Environmental Impact Assessment
EPMP	Ecological Protection and Mitigation Plan
EPMS	Ecological Protection and Mitigation Strategy
EqIA	Equality Impact Assessment
ES	Environmental Statement
FRADS	Flood Risk Assessment and Drainage Strategy
FTE	Full Time Equivalent
GVA	Gross Value Added
LEMP	Landscape and Ecological Management Plan
OEMP	Operational Environmental Management Plan
PEIR	Preliminary Environmental Information Report
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
SRMP	Soil Resources Management Plan
SSCEP	Skills, Supply Chain and Employment Plan
SWMP	Site Waste Management Plan
WRS	Water Resources Strategy

2 Written Questions

2.1 Air Quality and Emissions

Table 2-1 Air Quality and Emissions

ExQ	Respondent	Question	Applicant's Response
AQ2.1	Dorset and Wiltshire Fire and Rescue Service	**Battery Energy Storage System (BESS) Thermal Runway Event** Dorset and Wiltshire Fire and Rescue Service are requested to consider the applicant's response to the Examining Authority's (ExA's) ExQ1 specifically AQ1.3 [REP3-128], and in addition to doing so provide a response to the following: 1. During a thermal runway event advise where would the secondary water source come from once the on-site water storage units are empty. 2. Provide detail on how many fire appliances the fire service would have available at any one time in the likely event of a fire at either a single or multiple containers and would this be sufficient to deal with any thermal runway event. 3. Whether the fire service has had any discussions with the applicant and/ or local highway authority	All required information has been provided to Dorset and Wiltshire Fire and Rescue Service. The **Statement of Common Ground with Dorset and Wiltshire Fire and Rescue Service [REP4-069]** submitted at Deadline 4 confirms that all matters are now agreed.

ExQ	Respondent	Question	Applicant's Response
		about emergency access routes to the BESS enclosure.	

2.2 Assessment of Alternatives

Table 2-2 Assessment of Alternatives

<table>
<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td>ALT2.1</td><td>The Applicant</td><td>Site Selection Process – Consistency Q1
The applicant's Technical Note on Site Selection Assessment [REP2-043] sets out, in Table 4-1, areas of newly drawn Potential Development Areas (PDAs) with all constraints removed. However, it neglects to provide a figure for PDA 10 (the site subject of this application) on the basis that the document focuses on alternatives to the current site. However, the ExA requires Table 4-1 to be updated to include PDA 10 to provide an overall comparison between sites to ensure that a consistent site selection process was undertaken.</td><td>The updated table 4-1 which includes the area of PDA10 with the same constraints removed, is set out below:

Table 4-1 Areas of the newly drawn PDAs with all constraints removed
<table><tr><th>Potential Development Area (PDA)</th><th>Area remaining when constraints removed (ha)</th></tr><tr><td>PDA 1</td><td>192.5</td></tr><tr><td>PDA 2</td><td>120.7</td></tr><tr><td>PDA 3</td><td>632.0</td></tr><tr><td>PDA 4</td><td>204.8</td></tr><tr><td>PDA 5</td><td>29.1</td></tr><tr><td>PDA 6</td><td>197.8</td></tr><tr><td>PDA 7</td><td>58.6</td></tr></table></td></tr>
</table>

<table>
<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>PDA 8</td><td>161.7</td></tr>
<tr><td>PDA 9</td><td>109.5</td></tr>
<tr><td>PDA 10</td><td>729</td></tr>
<tr><td>PDA 11</td><td>175.9</td></tr>
<tr><td>PDA 12</td><td>570.9</td></tr>
</table>

The purpose of removing constraints from potential development areas (PDA) was to investigate whether the unconstrained land remaining in the PDA could be combined with another to create a cluster and then considered as an alternative to the Scheme. Given the purpose was to identify alternative PDAs to the Scheme, it is not considered appropriate to create a cluster that includes PDA10 itself.

Notwithstanding this, there is considered to be no scope for combining the unconstrained land within PDA10 with other unconstrained PDAs, given that PDA10 is relatively isolated and does not lend itself to a practical electrical connection with other PDAs.

In addition, PDA1, the nearest PDA to the east, is separated from PDA10 by a substantial area of Flood Zone 3. In addition, given that PDA1 is divided into two relatively</td></tr>
</table>

ExQ	Respondent	Question	Applicant's Response
			small parcels, neither parcel is of sufficient scale to warrant the provision of a separate high-voltage substation.
ALT2.2	The Applicant	Site Selection Process – Consistency Q2 It is not clear to the ExA that a consistent approach has been applied to the site selection process given that the current site contains environmental constraints used to justify the exclusion of other sites, i.e. flood risk, ecology, cultural heritage and landscape. This is particularly prominent through the applicant's Technical Note on Site Selection Assessment [REP2-043] as highlighted by the ExA in ExQ1 ALT1.1. Furthermore, it is not clear whether those sites assessed at stages 1 - 4 were then re-assessed with the more flexible criteria identified at stages 5 and 6 in the applicant's search assessment. The applicant is asked to provide a table showing the information on each PDA considered in the Environmental	As requested, **Table 2-2-1** provides an overview of each PDA, the assessment undertaken, commentary which provides the factors that led to PDAs being discounted and the key differences between each PDA and PDA 10 (the Scheme). Furthermore, a summary of the PDA RAG ratings is provided at **Table 2-2-2** to aid understanding. The Applicant's position is that a logical and consistent approach has been taken to site selection, which reflects the requirements of national and local planning policy. The site selection process seeks to demonstrate a sequential approach through initially the exclusion of constraints, to determine whether an unconstrained site could deliver the Scheme. Given there were no suitable unconstrained sites, constraints were then introduced, hence the reason that the site for the Scheme contains constraints. In terms of the unconstrained sites identified, these were not re-assessed or their boundaries redrawn as explained in paragraph 5.1.2 of the **Technical Note on Site Selection Assessment [REP2-043]** where it states

ExQ	Respondent	Question	Applicant's Response
		Statement (ES) Chapter 4 [APP-056], Appendix 4-1 Site Selection Assessment Report [APP-185] and Technical Note on Site Selection Assessment [REP2-043] with a concise commentary as to the key differences and why each site was discarded resulting in the current Order limits.	that regardless of the stage at which any PDA is identified in the assessment, they were RAG rated against the same standard assessment criteria, as set out in Annexes A and D of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Therefore, whilst the criteria for identifying the PDAs changes throughout the site selection assessment, the PDAs identified at each stage have been consistently assessed against the same criteria. Further, where PDAs are identified close to each other and there is a possibility that they can be joined, this is acknowledged and taken into account in the assessment. Further still, as a check and balance exercise, the Applicant considered the entire search area at the last stage of site selection to identify and consider any land that had not been captured by a PDA. This check and balance exercise was carried out at both Stage 5 and Stage 6 of the site selection assessment. However, as also set out in the **Technical Note on Site Selection Assessment [REP2-043]**, further consideration was given to the potential addition of land to PDAs 1-4 to improve their suitability as an alternative for the Scheme. The outcome of this exercise is set out in paragraphs 5.1.5 to 5.1.13 of the **Technical Note on Site**

ExQ	Respondent	Question	Applicant's Response
			Selection Assessment [REP2-043] and summarised in Table 2.
ALT2.3	The Applicant	**Site Selection Process – Consistency Q3** In the ES Chapter 4 [APP-056], it is not clear that a consistent methodology was applied to the cable route corridor (CRC) selection process. Paragraph 4.6.4 appears to add an additional criterion (road verge) to allow a further route to be considered. The applicant is asked to explain why the use of road verge was added to cater for Route 4, and if the use of the road verge was considered for any other route, and if not, why not.	To clarify, the road verge referred to at paragraph 4.6.4 of **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** is a description of the route along the A350. The criteria applied at the initial optioneering stage was the same for all of the four routes. The A350 was added as it could have utilised an existing north south route along exiting infrastructure which could have avoided the identified constraints while following the route selection methodology. Use of the road verge was considered for all routes with the extent of verge depending on how the potential cable route interacted with the alignment of the road network.
ALT2.4	The Applicant	**Site Selection Process – Consistency Q4** ES Chapter 4 [APP-056] sets out why land at Melksham was discounted for the location of the BESS Area. However, it is not clear what weighting was applied to those concerns bulleted in paragraphs 4.7.3 and 4.7.4 that led	In comparing the location near Melksham to the locations in Lime Down D, the Applicant considered the environmental constraints identified with baseline survey and assessment work carried out to date. The Land at Melksham Substation forms a south facing slope to the north of Whitley, rising from approximately 62m AOD along the southern edge of the Site, to approximately 80m AOD along the northern edge. As a

ExQ	Respondent	Question	Applicant's Response
		to Melksham being discounted over the environmental concerns of siting the BESS Area at Lime Down D. The applicant is asked to provide further detail as to the weighting that was applied when weighing up siting the BESS at Melksham or at Lime Down D.	result, the BESS Area, as well as mitigation measures required to screen it, would likely cause adverse effects on the intact character of the rural agricultural landscape which forms the setting on Whitley, as well as views from Whitley and from further south, and local Public Rights of Way. Land at Melksham Substation is adjacent to a Roman road to the north. There are also four Grade II listed buildings to the south of the Land at Melksham Substation positioned along the north side of Top Lane: Pear Tree Inn (NHLE 1364121), Northey's Farm (NHLE 1285547), Whitley House (NHLE 1021775) and Barn to Rear of Whitley House (NHLE 1285548). All four listed buildings have a visual relationship with the proposed BESS site. Due to the proximity to the listed buildings, the rising topography and height of the proposed BESS, there would be potential for the Scheme to cause an indirect impact that could not be mitigated to these assets i.e. impact to elements of their setting that contribute to their significance. Northey's Farm (NHLE 1285547) has a historical relationship with land within the proposed BESS site. Introducing BESS infrastructure would have had a detrimental effect on the way the building is currently appreciated, namely, as a historic farm

ExQ	Respondent	Question	Applicant's Response
			building set directly next to its associated and a largely intact historic field system. The site also has a visual relationship with the prominent Grade II* listed Christ Church (NHLE 1194686), which is located to the south of the site in Shaw. As set out under paragraph 4.7.2 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056],** the land at Lime Down D represented the option with fewer overall effects that the Land at Melksham Substation because it is centrally located within Solar PV Sites, well screened, is not close to many residential receptors and is in close proximity to other built infrastructure (existing railway line). Overall, the location of the BESS Area within Lime Down D had lower potential for significant effects. It was considered that implementing the BESS Area at the Land at Melksham Substation would likely result in significant effects and that mitigation and avoidance would not be possible. Feedback at non-statutory consultation highlighted also noted particular concern for the visual impact of the proposed BESS area on the villages of Whitley and Shaw, in particular at Top Lane.

ExQ	Respondent	Question	Applicant's Response
			Furthermore, the Applicant confirms that the design of the Scheme's battery infrastructure has been proactively informed by the National Fire Chiefs Council (NFCC) guidance, which was progressing through development at the time of the Non-Statutory Consultation in 2024. Due consideration was given to this guidance, which at the time was forthcoming and is now in effect and applied at Lime Down D, which would have resulted in significant design implications for the Whitley BESS site. As stated the Scheme now adheres to the 2026 NFCC revised guidance as secured through the **Outline Battery Safety Management Plan [REP3-106].** The Applicant identified that applying the latest fire safety standards at the Whitley BESS site would have presented design and engineering difficulties. Specifically, a scenario for BESS unit spacing of up to 6m at the time mandated by NFCC to prevent fire propagation would have been more difficult to implement effectively with the site's topography. To achieve a safe and compliant layout, the Whitley site would have required large amounts of terracing and groundworks of the terrain to create the level platforms necessary for the battery containers and their foundations. This would have resulted in a greater environmental and landscape impact compared to the preferred BESS location at Lime Down D.

ExQ	Respondent	Question	Applicant's Response
			Furthermore, the local terrain at the Whitley site made the implementation of emergency access routes more complex. Meeting the requirement for a secondary emergency access location was particularly difficult to achieve at Whitley due to these topographical constraints and the need to provide access from, and onto, the fast traffic flow of the B3353 (Goodes Hill) where visibility splays are limited. The Land at Melksham Substation was therefore discounted before progressing to a detailed weighting assessment.

Table 2-2-1 Summary of Potential Development Areas Assessed

Potential Development Area	Assessment Undertaken	Commentary
PDA 1 – Lyneham 256.03 ha	PDA 1 was assessed against the assessment indicators set out in **Annex A** of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	PDA 1 was discounted following assessment, as a result of the following factors: • Located immediately adjacent to an ancient woodland in multiple locations.

Potential Development Area	Assessment Undertaken	Commentary
		• Located adjacent to a cluster of heritage assets. • Several public rights of way within the northern portion. • Bordered by areas of Flood Zone 2 and 3. • The northerly portion of the PDA encompasses the hamlet of Sodom. • The southerly portion of the PDA is already used by an existing solar farm development. • The PDA is too small to deliver the Scheme. See paragraphs 3.2.7 to 3.2.9 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. Whilst is it noted that PDA1 is RAG rated green for landscape, compared to PDA10 which is RAG rated amber, the key difference between PDA 1 and PDA 10 is site size which is RAG rated red for PDA 1 and green for PDA10. See **Table 2-2-2**.
	The PDA was not assessed further once constraints had been introduced into the area of	No additional land was identified for consideration around PDA 1 as, whilst areas of constrained land have been

Potential Development Area	Assessment Undertaken	Commentary
	search. As explained in paragraph 5.1.2 of the **Technical Note on Site Selection Assessment [REP2-043]** the Applicant did not redraw and reassess PDAs 1-4 against the more permissive constraints on the basis that those areas of land had already been assessed and discounted. Instead, the Applicant focussed its assessment on considering new areas of land. All PDAs, regardless of the stage at which they were identified in the assessment, were RAG rated against the same standard assessment criteria, as set out in **Annexes A and D of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP185]**. Therefore whilst the criteria for identifying the PDAs changes throughout the site selection assessment, the PDAs identified at each stage have been consistently assessed against the same criteria, Further, where PDAs were identified close to each other and there is a possibility that they can be joined, this was acknowledged and taken into the assessment. Further still, as a check and balance exercise, the Applicant considered the entire search area at Stage 6 of the site selection	removed from the PDA itself, the area around the PDA is generally constrained by Flood Zones 2 and 3, ancient woodland, built development and heritage assets including various Grade II Listed buildings and a schedule monument to the north, as explained in paragraph 5.1.7 of the **Technical Note on Site Selection Assessment [REP2-043]**.

Potential Development Area	Assessment Undertaken	Commentary
	process and sought to identify and consider any land that had not been captured by a PDA. Notwithstanding, a high-level assessment was undertaken to consider if further land could be added to PDA 1 to improve its suitability as an alternative to the Scheme.	
	The PDA was considered further to establish whether the PDA could form part of a cluster, as set out in the **Technical Note on Site Selection Assessment [REP2-043]**.	PDA 1 was not identified to form part of a cluster due to its distance from other PDAs to form viable clusters and its size, which would make it less efficient for connection from an electrical standpoint, as explained in paragraph 4.1.6 of the **Technical Note on Site Selection Assessment [REP2-043]**.
PDA 2 – East of Melksham 243.34 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	Whilst it was noted that PDA 2 is close to the point of connection at Melksham substation and the land is flat and unshaded, PDA 2 was discounted following assessment, as a result of the following factors: • Nearby areas of ancient woodland. • Multiple public rights of way within the PDA. • Special Landscape Area located 50m to the north of the PDA.

Potential Development Area	Assessment Undertaken	Commentary
		• Bordered by areas of Flood Zone 2 and 3. • The northern portion of the PDA is intersected by a large area at high risk from surface water flooding (3.3% annual chance). • The PDA is too small to deliver the Scheme. • Two existing solar farms are located in the PDA. • The boundary of the PDA overlaps with a strategic allocation contained within Wiltshire Council's emerging local plan. See paragraphs 3.2.10 to 3.2.12 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. Whilst is it noted that PDA2 is RAG rated green for access for construction traffic, compared to PDA10 which is RAG rated amber, the key difference between PDA 2 and PDA 10 is land use which is RAG rated red for PDA 2 and green for PDA10. See **Table 2-2-2**.
	The PDA was not assessed further once constraints had been introduced into the area of search. As explained in paragraph 5.1.2 of	With all constraints removed, PDA 2 comprises 120.7 ha and adding the land to the south of PDA 2 (391.1 ha) would bring the total size of the PDA to 511.8 ha. This

Potential Development Area	Assessment Undertaken	Commentary
	the **Technical Note on Site Selection Assessment [REP2-043]** the Applicant did not redraw and reassess PDAs 1-4 against the more permissive constraints on the basis that those areas of land had already been assessed and discounted. Instead, the Applicant focussed its assessment on considering new areas of land. All PDAs, regardless of the stage at which they were identified in the assessment, were RAG rated against the same standard assessment criteria, as set out in **Annexes A and D of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP185]**. Therefore whilst the criteria for identifying the PDAs changes throughout the site selection assessment, the PDAs identified at each stage have been consistently assessed against the same criteria, Further, where PDAs were identified close to each other and there is a possibility that they can be joined, this was acknowledged and taken into the assessment. Further still, as a check and balance exercise, the Applicant considered the entire search area at Stage 6 of the site selection process and sought to identify and consider any land that had not been captured by a PDA.	would not be large enough on its own to accommodate a project equivalent to the Scheme and therefore its addition would not make a material difference when PDA 2 is assessed on its own.

Potential Development Area	Assessment Undertaken	Commentary
	Notwithstanding, a high-level assessment was undertaken to consider if further land could be added to PDA 2 to improve its suitability as an alternative to the Scheme.	
	The PDA was considered further to establish whether the PDA could form part of a cluster, as set out in the **Technical Note on Site Selection Assessment [REP2-043]**.	PDA 2 formed part of Cluster 1, see commentary below.
PDA 3 – Marston 932.51 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	Whilst it was noted that PDA 3 is relatively flat and open, and of sufficient size, PDA 3 was discounted following assessment as a result of the following factors: • Various main rivers surround the PDA including multiple tributaries of Semington Brook. • Located immediately adjacent to areas of Flood Zone 2 and 3. • Multiple public rights of way within the PDA • The grid connection would need to be routed over various watercourses and is also likely to cross the Wessex mainline and Reading-Taunton rail line.

Potential Development Area	Assessment Undertaken	Commentary
		• An ancient woodland located approximately 230 m from the boundary. • A number of SSSIs and other statutorily designated sites within 2 km including Salisbury Plain. • Three Grade II Listed Buildings located within the boundary, multiple Grade I listed buildings within 500 m of the boundary. • Surrounded by multiple Conservation Areas • The largest land parcel in PDA 3 is intersected by Registered Common Land. • The PDA boundaries also overlap with the large village of Worton and its associated Conservation Area. • Two existing solar farms are located within the boundary of the PDA. See paragraphs 3.2.13 to 3.2.15 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.

Potential Development Area	Assessment Undertaken	Commentary
		The key differences between PDA 3 and PDA 10 are land use and cultural heritage which are RAG rated red for PDA 3 and green and amber respectively for PDA10. See **Table 2-2-2**.
	The PDA was not assessed further once constraints had been introduced into the area of search. As explained in paragraph 5.1.2 of the **Technical Note on Site Selection Assessment [REP2-043]** the Applicant did not redraw and reassess PDAs 1-4 against the more permissive constraints on the basis that those areas of land had already been assessed and discounted. Instead, the Applicant focussed its assessment on considering new areas of land. All PDAs, regardless of the stage at which they were identified in the assessment, were RAG rated against the same standard assessment criteria, as set out in **Annexes A and D of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP185]**. Therefore whilst the criteria for identifying the PDAs changes throughout the site selection assessment, the PDAs identified at each stage have been consistently assessed against the same criteria, Further, where PDAs were identified	Land between PDAs 3 and 4 was considered and discounted in the high level assessment carried out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** (see paragraphs 3.4.13 - 3.4.14). The reasons for discounting that land were flood risk, with large sections within Flood Zone 2 and 3 and areas at high risk of surface water flooding, and the presence of heritage assets across the area.

Potential Development Area	Assessment Undertaken	Commentary
	close to each other and there is a possibility that they can be joined, this was acknowledged and taken into the assessment. Further still, as a check and balance exercise, the Applicant considered the entire search area at Stage 6 of the site selection process and sought to identify and consider any land that had not been captured by a PDA. Notwithstanding, a high-level assessment was undertaken to consider if further land could be added to PDA 3 to improve its suitability as an alternative to the Scheme.	
	The PDA was considered further to establish whether the PDA could form part of a cluster, as set out in the **Technical Note on Site Selection Assessment [REP2-043]**.	PDA 3 formed part of Clusters 1 and 2, see commentary below.
PDA 4 – Trowbridge/ Westbury 485.43 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	PDA 4 was discounted following assessment, as a result of the following factors: • Multiple public rights of way within the PDA and the Wiltshire Regional Cycleway is located 500 m to the north of the boundary.

Potential Development Area	Assessment Undertaken	Commentary
		• The PDA boundaries are in close proximity to the settlements of Trowbridge, Ashton Common, Dilton Marsh and Bratton. • Small areas of the Green Lane Wood Local Nature Reserve and the North Trowbridge Country Park are contained within the PDA boundary, alongside various designations of Open Space and Play Facilities. • An existing solar farm is located within the boundary of the PDA. • Comparatively more areas of high risk from surface water flooding (3.3% annual chance) compared with PDAs 1, 2 and 3. • The PDA is located immediately adjacent to a Scheduled Monument and there are over 10 Scheduled Monuments within 2 km from the PDA boundary. There is one Grade II Listed Building located within the PDA boundary and multiple Grade II and II* Listed Buildings within 500 m of the boundary. The PDA is also located approximately 45 m from Bratton Conservation

Potential Development Area	Assessment Undertaken	Commentary
		Area and within 500m of the Hilperton Conservation Area. • Grid Connection constraints given the PDA is located between the larger settlements of Trowbridge and Westbury, with their associated infrastructure. See paragraphs 3.2.16 to 3.2.18 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. The key differences between PDA 4 and PDA 10 are cultural heritage and grid connection which are RAG rated red for PDA 4 and amber for PDA10. See **Table 2-2-2**.
	The PDA was not assessed further once constraints had been introduced into the area of search. As explained in paragraph 5.1.2 of the **Technical Note on Site Selection Assessment [REP2-043]** the Applicant did not redraw and reassess PDAs 1-4 against the more permissive constraints on the basis that those areas of land had already been assessed and discounted. Instead, the Applicant focussed its	Land between PDAs 3 and 4 had already been considered and discounted in the high-level assessment carried out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** (see paragraphs 3.4.13 - 3.4.14). The reasons for discounting that land were flood risk, with large sections within Flood Zone 2 and 3 and areas at high risk of surface water flooding, and the presence of heritage assets across the area.

Potential Development Area	Assessment Undertaken	Commentary
	assessment on considering new areas of land. All PDAs, regardless of the stage at which they were identified in the assessment, were RAG rated against the same standard assessment criteria, as set out in **Annexes A and D of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP185]**. Therefore whilst the criteria for identifying the PDAs changes throughout the site selection assessment, the PDAs identified at each stage have been consistently assessed against the same criteria, Further, where PDAs were identified close to each other and there is a possibility that they can be joined, this was acknowledged and taken into the assessment. Further still, as a check and balance exercise, the Applicant considered the entire search area at Stage 6 of the site selection process and sought to identify and consider any land that had not been captured by a PDA. Notwithstanding, a high-level assessment was undertaken to consider if further land could be added to PDA 4 to improve its suitability as an alternative to the Scheme.	

Potential Development Area	Assessment Undertaken	Commentary
	The PDA was considered further to establish whether the PDA could form part of a cluster, as set out in the **Technical Note on Site Selection Assessment [REP2-043]**.	PDA 4 was not identified to form part of a cluster due to its distance from other PDAs to form a viable cluster, and its size, which would make it less efficient for connection from an electrical standpoint, as explained in paragraph 4.1.6 of the **Technical Note on Site Selection Assessment [REP2-043]**.
PDA 5 – Whitley 461.4 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	PDA 5 was discounted following assessment, as a result of the following factors: • A number of public rights of way across the site. • Nearby residential receptors in Whitley approximately 160 m south of the PDA, and Atworth and Gastard abutting the PDA to the north and south. • Area of Flood Zone 3 within the PDA. • 20% of the PDA identified as Grade 2 agricultural land. • An approved planning permission for a solar farm is located in the PDA. • Gastard Conservation Area is partially located within the PDA, together with four Grade II Listed Buildings and one Grade II* Listed Building within

Potential Development Area	Assessment Undertaken	Commentary
		the PDA boundary, and numerous listed buildings within 500 m of the boundary. • The PDA is too small to deliver the Scheme. See paragraphs 3.3.6 to 3.3.8 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. Whilst is it noted that PDA5 is RAG rated green for access for construction traffic and grid connection, compared to PDA10 which is RAG rated amber for both factors, the key differences between PDA 5 and PDA 10 are land use and cultural heritage which are RAG rated red for PDA 5 and green and amber respectively for PDA10. See **Table 2-2-2**.
	The PDA was considered further to establish whether the PDA could form a cluster.	PDA 5 was not identified to form part of a cluster on the basis that the site is small and not contiguous and therefore it's inclusion would not be electrically efficient, as explained in paragraph 4.1.6 of the **Technical Note on Site Selection Assessment [REP2-043]**.

Potential Development Area	Assessment Undertaken	Commentary
PDA 6 – Wraxall 528.7 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	PDA 6 was discounted following assessment, as a result of the following factors: • Partially located in part of the Bath and Bradford on Avon bat Impact Zone. • Multiple public rights of way intersecting the site and the PDA is intersected by the Wiltshire Cycleway. • The PDA is located near the settlements of Atworth, The Common and South and Lower Wraxall. • There is one Grade II listed building within the PDA and multiple listed buildings within 500 m, together with conservation areas related to surrounding villages. • The PDA is intersected by a fairly large area of Flood Zone 3 land associated with an unnamed tributary of the Avon located approximately 10 m from the PDA boundary. • The eastern section of the PDA is subject to an approved planning permission for a solar farm.

Potential Development Area	Assessment Undertaken	Commentary
		• The PDA is too small to deliver the Scheme. See paragraphs 3.3.9 to 3.3.11 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. Whilst is it noted that PDA 6 is RAG rated green for access for construction traffic, field shading and grid connection, compared to PDA10 which is RAG rated amber for these factors, the key differences between PDA 6 and PDA 10 are land use and flood risk which are RAG rated red for PDA 6 and green and amber respectively for PDA10. See **Table 2-2-2**.
	The PDA was considered further to establish whether the PDA could form part of a cluster.	PDA 6 formed part of Clusters 1 and 3, see commentary below.
PDA 7 – Lacock 272.3 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	PDA 7 was discounted following assessment, as a result of the following factors: • Multiple public rights of way across the PDA. • Residential receptors abut the PDA to the boundary along Woodrow Road, Forest Lane and Bewley Cresent.

Potential Development Area	Assessment Undertaken	Commentary
		• PDA is immediately adjacent to the Spye and Bowood Parklands Special Landscape Area. • There are two Grade II listed buildings located in the PDA and multiple listed buildings within 500 m. • PDA is made up of large areas of Flood Zones 2 and 3 pertaining to the River Avon (main river) which runs directly parallel to the entire PDA. • Initial approaches to landowners revealed a lack of opportunity to accommodate the Scheme • The PDA is too small to deliver the Scheme. See paragraphs 3.3.12 to 3.3.14 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. Whilst is it noted that PDA 7 is RAG rated green for ecology and biodiversity, access for construction traffic, field shading, grid connection and topography, compared to PDA 10 which is RAG rated amber for these factors (apart from topography, which is also RAG rated green), the key differences between PDA 7 and PDA 10

Potential Development Area	Assessment Undertaken	Commentary
		are land use, cultural heritage and flood risk which are RAG rated red for PDA 6 and green, amber and amber respectively for PDA 10. See **Table 2-2-2**.
	The PDA was considered further to establish whether the PDA could form part of a cluster.	PDA 7 was not identified to form part of a cluster on the basis that the site is small and not contiguous and therefore it's inclusion would not be electrically efficient, as explained in paragraph 4.1.6 of the **Technical Note on Site Selection Assessment [REP2-043]**.
PDA 8 – Inmarsh 520.6 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	PDA 8 was discounted following assessment, as a result of the following factors: • Seend Ironstone Quarry and Road Cutting SSSI is located approximately 55 m to the north of the PDA boundary. • Multiple public rights of way located across the PDA. • The PDA abuts the settlements of Keevil, The Stocks, Seed, Poulshot and Bulkington. • Keevil and Poulshot Conservation Area partially infringe on the boundary. There are also four Grade II Listed Buildings within the PDA boundary and multiple listed buildings within 500 m. Seend

Potential Development Area	Assessment Undertaken	Commentary
		Conservation Area is also located immediately adjacent to the north of the PDA boundary. • PDA is made up of large areas of Flood Zones 2 and 3 pertaining to Semington Brook which runs directly through the centre of the PDA. • Initial approaches to the landowners revealed a lack of opportunity to accommodate the Scheme. • The PDA is too small to deliver the Scheme. See paragraphs 3.3.15 to 3.3.17 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. Whilst is it noted that PDA 8 is RAG rated green for access for construction traffic compared to PDA 10 which is RAG rated amber, the key differences between PDA 8 and PDA 10 are land use, cultural heritage and flood risk which are RAG rated red for PDA 8 and green, amber and amber respectively for PDA 10. See **Table 2-2-2**.

Potential Development Area	Assessment Undertaken	Commentary
	The PDA was considered further to establish whether the PDA could form part of a cluster.	PDA 8 formed part of Clusters 1 and 2, see commentary below.
PDA 9 – Rowdefield 849.6 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	Whilst it was noted that PDA 9 was of sufficient size to accommodate the Scheme and there were no obvious access constraints for construction traffic, the PDA was discounted following assessment, as a result of the following factors: • Roundway Down and Covert SSSI is located immediately adjacent to the eastern boundary of the PDA and two further SSSIs within 1km of the PDA boundary. • There are two areas of Ancient Woodland within 500 m of the PDA boundary. • Approximately 20% of the PDA is located on Grade 2 agricultural land, with a small section of Grade 1. • The PDA is immediately adjacent to the North Wessex Downs National Landscape and Spye and Bowood Parklands Special Landscape Area. North Wessex Downs National Landscape is at a significantly higher elevation than the PDA in this particular location and would result in likely

Potential Development Area	Assessment Undertaken	Commentary
		significant landscape and visual impacts due to elevated views from sensitive receptors within the National Landscape. • Multiple heritage constraints in the vicinity of the PDA including eight Scheduled Monuments. See paragraphs 3.3.18 to 3.3.20 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. Whilst is it noted that PDA 9 is RAG rated green for access for construction traffic compared to PDA 10 which is RAG rated amber, the key differences between PDA 9 and PDA 10 are landscape and visual and cultural heritage which are RAG rated red for PDA 8 and amber for PDA 10. See **Table 2-2-2**.
	The PDA was considered further to establish whether the PDA could form part of a cluster.	The main reason that PDA 9 was not identified to form part of a cluster was because it is entirely constrained by landscape effects, given the elevated position of the North Wessex Downs National Landscape to the east of the PDA and the likely views from it over the PDA, as explained in paragraph 4.1.6 of the **Technical Note on Site Selection Assessment [REP2-043]**.

Potential Development Area	Assessment Undertaken	Commentary
PDA 10 – Lime Down 878 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	PDA 10 comprises the site for the Scheme. The following factors were noted in **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**: • The majority of the PDA is comprised of Grade 3 agricultural land, with some smaller sections of Grade 4 and one small section of Grade 2 land (approximately 5%). • The PDA slightly infringes upon Harries Ground SSSI boundary, however given the limited nature of the infringement, it was anticipated that any effects could be mitigated at a later project stage. • There are no listed buildings or conservation areas within the PDA, but multiple listed buildings within 500 m. • Access for construction vehicles would involve the use of local roads and may require some mitigation. • The PDA has small sections of Flood Zone 3 land in the parcel closest to Corston and near Fosse Farm.

Potential Development Area	Assessment Undertaken	Commentary
		In summary, there were no major constraints identified which would render PDA 10 unviable for the Scheme and initial approaches to landowners were positively received and sufficient land was made available by landowners to accommodate the Scheme. On this basis, PDA 10 represented the preferred location for the Scheme. See paragraphs 3.3.21 to 3.3.23 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.
PDA 11 – Broughton Gifford 429 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185]**.	PDA 11 was discounted following assessment, as a result of the following factors: • Multiple public rights of way located across the PDA and the Wiltshire Cycleway runs adjacent to the southern boundary. • Multiple listed buildings within 500 m of the PDA boundary including three Grade 1 Listed Buildings within 200 m and location of the Broughton Gifford Conservation Area between the PDA parcels. • PDA is intersected by several areas of Flood Zone 3 associated with a tributary (designated as a main

Potential Development Area	Assessment Undertaken	Commentary
		river) of the River Avon. There are also scattered sections of the PDA that are at high risk from surface water flooding (3.3% annual chance). • Approximately 40% of the PDA is within the Bristol Avon Mineral Resource Zone and Mineral Safeguarding Area for sand and gravel. • The PDA contains 4 ha of common land, and an operational solar farm. • The PDA is too small to deliver the Scheme. See paragraphs 3.4.5 to 3.4.7 and Annex D: Potential Development Area Assessment Results of **ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**. Whilst is it noted that PDA 11 is RAG rated green for field shading and grid connection compared to PDA 10 which is RAG rated amber for these factors, the key differences between PDA 11 and PDA 10 are land use and flood risk which are RAG rated red for PDA 11 and green and amber respectively for PDA 10. See **Table 2-2-2**.

Potential Development Area	Assessment Undertaken	Commentary
	The PDA was considered further to establish whether the PDA could form part of a cluster.	PDA 11 formed part of Clusters 1 and 3, see commentary below.
PDA 12 – Beckington 731 ha	Assessed against the assessment indicators set out in **Annex A of ES Volume 3, Appendix 4-1Site Selection Assessment Report [APP-185]**.	PDA 12 was discounted following assessment, as a result of the following factors: • Southwick Country Park LNR sits immediately adjacent to the north-east of the PDA. • There are areas of Ancient Woodland within 500 m of the PDA boundary. • Multiple public rights of way across the PDA and the Wiltshire Cycleway runs through the PDA and the Macmillans Way long distance walking route intercepts the PDA boundary. • There is one Grade 1 Listed Building, two Grade II Listed Buildings and a Scheduled Monument within the PDA boundary and multiple Listed Buildings within 500 m of the boundary. • The PDA is too small to deliver the Scheme. See paragraphs 3.4.8 to 3.4.11 and Annex D: Potential Development Area Assessment Results of **ES Volume 3,**

Potential Development Area	Assessment Undertaken	Commentary
		Appendix 4-1Site Selection Assessment Report [APP-185]. Whilst is it noted that PDA 12 is RAG rated green for access for construction traffic, flood risk and field shading compared to PDA 10 which is RAG rated amber for these factors, the key differences between PDA 12 and PDA 10 are cultural heritage and site size which are RAG rated red for PDA 11 and amber and green respectively for PDA 10. See **Table 2-2-2**.
	The PDA was considered further to establish whether the PDA could form part of a cluster.	PDA 12 formed part of Cluster 1, see commentary below.
Cluster 1 Formed of the unconstrained areas of PDAs 2, 3, 6, 8 and 11	A high level assessment was undertaken as set out in Section 4 of the **Technical Note on Site Selection Assessment [REP2-043]**.	Cluster 1 was discounted following a high-level assessment, as explained in section 4.2 of the **Technical Note on Site Selection Assessment [REP2-043]**, as a result of the following factors: • Cultural heritage, in particular the presence of Broughton Gifford conservation area between the distinct sections of PDA 11. The combination of PDA 11 and PDA 6 to the north results in the conservation area being bordered on three sides. There are also a number of conservation

Potential Development Area	Assessment Undertaken	Commentary
		areas to the west of PDAs 3 and 8 and PDA 3 also has a Grade II Listed building which would be entirely surrounded. • PDA 8 was discounted during the initial site selection assessment partially because initial approaches to landowners revealed a lack of opportunity to accommodate the Scheme, and it was assumed that this constraint still applied.
Cluster 2 Formed of the unconstrained areas of PDAs 3 and 8	A high level assessment was undertaken as set out in Section 4 of the **Technical Note on Site Selection Assessment [REP2-043]**.	Cluster 2 was discounted following a high-level assessment, as explained in section 4.3 of the **Technical Note on Site Selection Assessment [REP2-043]**, as a result of the following factors: • Cultural heritage, due to a number of conservation areas to the west of PDAs 3 and 8. PDA 3 also has a Grade II Listed building which would be entirely surrounded. It is also noted that the heritage assets are closer to Cluster 2 than those identified near the Solar PV Sites of the Scheme. • PDA 8 was discounted during the initial site selection assessment partially because initial approaches to landowners revealed a lack of

Potential Development Area	Assessment Undertaken	Commentary
		opportunity to accommodate the Scheme, and it was assumed that this constraint still applied. It was noted that whilst Cluster 2 could potentially be developed following further design evolution which might allow for mitigation of cultural heritage constraints, it is considered that this option does not represent a more suitable or available alternative than the proposed Solar PV Sites that could be delivered in the same timescale.
Cluster 3 Formed of the unconstrained areas of PDAs 6, 11 and 12	A high level assessment was undertaken as set out in Section 4 of the **Technical Note on Site Selection Assessment [REP2-043]**.	Cluster 3 was discounted following a high-level assessment, as explained in section 4.4 of the **Technical Note on Site Selection Assessment [REP2-043]**, as a result of the following: • Cultural heritage - the inclusion of PDAs 6 and 11 within Cluster 3 brings the same heritage constraints as highlighted for Cluster 1 above, with the Broughton Gifford conservation area surrounded by solar development on three sides. Further, PDA 12 remains heavily constrained by heritage receptors, despite these being removed from the PDA boundary. This includes a scheduled monument close to the PDA boundary, a Grade I Listed Building and two Grade II Listed Buildings which would be entirely surrounded by the PDA,

Potential Development Area	Assessment Undertaken	Commentary
		and various other Listed Buildings and a conservation area nearby.

Table 2-2-2 Summary of Potential Development Area RAG rating

	PDA 1 Lyneham	PDA 2 East of Melksham	PDA 3 Marston	PDA 4 Trowbridge / Westbury	PDA 5 Whitley	PDA 6 Wraxall	PDA 7 Lacock	PDA 8 Inmarsh	PDA 9 Rowdefield	PDA 10 Lime Down	PDA 11 Broughton Gifford	PDA 12 Beckington
Ecology and Biodiversity												
Landscape and Visual												
Land Use												

	PDA 1 Lyneham	PDA 2 East of Melksham	PDA 3 Marston	PDA 4 Trowbridge / Westbury	PDA 5 Whitley	PDA 6 Wraxall	PDA 7 Lacock	PDA 8 Inmarsh	PDA 9 Rowdefield	PDA 10 Lime Down	PDA 11 Broughton Gifford	PDA 12 Beckington
Cultural Heritage												
Access for Construction Traffic												
Flood Risk												
Field Shading												
Grid Connection												
Topography												

	PDA 1 Lyneham	PDA 2 East of Melksham	PDA 3 Marston	PDA 4 Trowbridge / Westbury	PDA 5 Whitley	PDA 6 Wraxall	PDA 7 Lacock	PDA 8 Inmarsh	PDA 9 Rowdefield	PDA 10 Lime Down	PDA 11 Broughton Gifford	PDA 12 Beckington
Site Size												

2.3 Compulsory Acquisition and Land Rights

Table 2-3 Compulsory Acquisition and Land Rights

ExQ	Respondent	Question	Applicant's Response
CA2.1	The Applicant	**Land and Rights Negotiations Tracker Q1** The ExA notes that the colour key for the Land and Rights Tracker [REP4-008] states that cells shaded light grey means that no voluntary agreement is being sought. However, the applicant's summary of negotiations column in Part 1 of the Tracker for all the affected persons/ plots which have been shaded light grey, states that *the applicant if confident that temporary access rights can be voluntarily agreed*. The ExA seeks clarification on how the applicant can be confident of voluntarily agreeing temporary access rights if no voluntary agreements are being sought with the affected persons.	The Applicant confirms that neither Heads of Terms nor an option agreement are being sought where temporary possession is required to facilitate the transport of abnormal indivisible loads. The Applicant considers a licence agreement to be more suitable to agree with affected persons should the DCO be consented. The Applicant will write to affected persons before Deadline 6 to explain this position and offer a meeting to discuss the Scheme.
CA2.2	The Applicant	**Land and Rights Negotiations Tracker Q2**	The Applicant confirms that each of the statutory undertakers listed in Part 2 of the Land and Rights Tracker were contacted prior to the submission of the DCO application (as part of the statutory consultation)

ExQ	Respondent	Question	Applicant's Response
		In Part 2 of the Land and Rights Tracker [REP4-008], the applicant lists the statutory undertakers who may have apparatus and interest in various parcels of land, however, for many of these (for example, but not limited, to C.A. Telecom Limited, Melskham East Storage Limited, Southern Electric Power Distribution plc, etc.) the applicant's summary of negotiations cells merely state *n/a*, while the protective provision status cells state that the relevant undertaker would have the benefit of protective provisions set out in relevant parts of Schedule 15 of the dDCO but *has not requested bespoke protective provisions*. The ExA seeks confirmation from the applicant that the statutory undertakers which have not requested bespoke provisions have been consulted and communicated with in advance of and during this examination so that they are aware of the general draft protective provisions.	and once the DCO application had been accepted for Examination (as part of the notification process pursuant to s56 of the Planning Act 2008).
CA2.3	The Applicant	**Land and Rights Negotiations Tracker Q3**	The Applicant notes the comment and the summary of negotiations column for Part 3 of the **Land and Rights**

ExQ	Respondent	Question	Applicant's Response
		Part 3 of the Land and Rights Tracker [REP4-008] was inserted by the applicant at deadline 3 in response to ExQ1 CA1.18. The ExA notes, however, that the summary of negotiations column was not updated at deadline 4, and requests that the applicant updates this at deadline 5. While the ExA appreciates that the applicant's negotiations are primarily with the landowner, rather than tenants or leaseholders, the ExA is seeking a greater level of detail in the summary of negotiations column to evidence active dialogue with the affected persons, and it is seeking for the status of negotiations column to be colour coded as per the colour key used in Part 1. This is to provide the ExA with a greater understanding of the progress being made.	**Negotiations Tracker [REP4-008]** has been updated at Deadline 5. Regarding tenancy arrangements and negotiations in the Solar PV Sites with existing Option holders, please see below response to CA2.6. For those landowners with ongoing negotiations for Interconnecting Cable Routes and the Cable Route Corridor, through the Applicant's due diligence, the Applicant is not aware that any of the tenants or leaseholders have the ability to grant the necessary land rights sought through the voluntary agreements for the purpose of the Scheme. On that basis, negotiation for the necessary land rights is between the Applicant and the Landowners. However, the Applicant confirms that once negotiations with the landlords are sufficiently advanced, the Applicant will engage with tenants to address their concerns and ensure they are informed about Scheme progress.
CA2.4	The Applicant	**Negotiations Q1** The ExA acknowledges the applicant's comments at Compulsory Acquisition	The Applicant has complied with the guidance set out in relation to compulsory acquisition and has taken

ExQ	Respondent	Question	Applicant's Response
		Hearing 1 (CAH1) on 30 June 2026 that a number of landowners, particularly along the CRC, have an in-principle objection to the scheme and therefore may be unwilling to enter into a voluntary agreement. However, there have been multiple representations from affected persons (including some orally made at CAH1) that identify lack of engagement from the applicant for the private loss of land or rights, or the lack of meaningful engagement on alternative proposals that they believe could reduce the effect of the proposed development on their land (and farm businesses in some cases). Can you convince the ExA that you have sought to acquire land and rights by negotiation wherever practicable and only enough land to facilitate the development, in line with the guidance related to the procedures for the compulsory acquisition (CA) of land. Provide a general justification, and specific justification for all the affected parties listed in ExQ1 CA1.22 to CA1.33 [PD-010], many of whom spoke at CAH1. Note that	reasonable steps to acquire the necessary interests in land through voluntary agreement. It is noted that the guidance states that these negotiations can take place in parallel with the compulsory acquisition process. A record of these negotiations can be found in **Land and Rights Negotiations Tracker [REP4-008]** and the **Land and Rights Communication Log [REP4-076]**. The approach that the Scheme has adopted to facilitate these discussions has been to make reasonable efforts to discuss the Scheme with the affected parties face to face and appropriately record and share meeting minutes from conversations thereby promoting accountability. The Applicant has made reasonable endeavours to arrange a meeting to discuss heads of terms with the affected parties by distributing to all affected parties Scheme letters, issuing specific direct communications to the affected parties through emails and phone calls and where no responses have been received undertaking door knocking on the affected party's last known address The Applicant acknowledges that the fact that the detailed design for the cable route corridor is not currently known (and further surveys and ground investigation works

ExQ	Respondent	Question	Applicant's Response
		signposting to the Land and Rights Tracker status of negotiations column will not suffice.	are required post consent)has been raised in previous meetings with affected parties. The Applicant has sought to identify the key concerns raised by affected parties that are relevant to their specific properties and to understand any factors that are important to the continued operation of the land. Where reasonably practicable, the Applicant has sought to make amendments to the design to account for these. In light of the local opposition to the Scheme, the Applicant has met difficulties with some of the affected parties adopting the position of either only wishing to engage post decision/ consent or to not engage at all out of principal. Following the first Compulsory Acquisition Hearing, the Applicant has contacted each of those affected parties that have not signed a voluntary agreement to have a meeting making it clear that it would not prejudice their objection to the Scheme and seeking to better understand how the Scheme can work with them to mitigate any potential impacts. Summary of engagement with affected parties listed in ExQ1 CA1.22 to CA1.33:

ExQ	Respondent	Question	Applicant's Response
			Hawker Farms, Ashton Hawker – BoR Plot numbers - 08-002, 08-003, 09-012, 09-016 The Applicant has sought to have a meeting with the affected party to discuss the voluntary heads of terms and better understand the impacts of the Scheme on their current operations. To date, the Applicant has sent correspondence via letter and email and the affected party retains their position as stated on 02/04/2026, that they will not sign the voluntary Heads of Terms whilst the examination process is ongoing. The Applicant contacted the affected party on the 2 July 2026 after the ExA confirmed at the Compulsory Acquisition Hearing that such meetings would not prejudice their overall position, but no response has been received. **Richard Tanner, Isabel Ross – BoR Plot numbers - 10-004, 10-006** The Applicant has been engaging with the landowner's agent since June 2025 and negotiations in respect of an overarching voluntary agreement has progressed to one final clause outstanding. An overarching voluntary agreement is being sought in this instance, due to the landowner's appointed agent also representing other interests within the Order Limits. The Applicant is now arranging meetings to

ExQ	Respondent	Question	Applicant's Response
			discuss these terms with the individual affected parties. The Applicant is committed to agreeing voluntary agreements and has negotiated in a fair and reasonable manner looking to accommodate the land agents' requests where practicable. **Roberts Berry Farm,Cole Family – BoR Plot number - 08-004** Up until July 2026, the affected party had maintained the stance that any engagement with the Applicant is to be undertaken post consent. Following the Compulsory Acquisition Hearing, which the son of the affected party attended, the Applicant was able to arrange and attend a meeting with the affected party on 15 July 2026 to discuss their land in relation to the Scheme and potential impacts on the current operations. The Applicant noted down several key points the affected party highlighted to mitigate the impact of the Scheme on the current farming operations and is going through the process of actioning them accordingly. The Applicant remains committed to pursuing a voluntary agreement and the Applicant is scheduling a follow up meeting.

ExQ	Respondent	Question	Applicant's Response
			Manor Farm, Brunt Family - BoR Plot number - 09-003 The Applicant is sending a letter inviting the affected party to a meeting to discuss the works within their land plot and address any questions they may have. To date, the Applicant has maintained the position in the **Land and Rights Negotiations Tracker [REP4-008]** that a license will be sought post consent once it has been determined exactly where the temporary construction access will be located.. **Matthew Gerard Newman – BoR Plot number - 08-006** The Applicant has recently attended a meeting with the affected party on 15 July 2026 to discuss their site in relation to the Scheme and potential impacts on the current operations. The Applicant noted down several key points the affected party highlighted to mitigate the impact of the Scheme on the current farming operations and progress a voluntary agreement. The Applicant has also taken an action to signpost documents and answers within the DCO documentation to assist the affected party in understanding the Scheme and provide clarity to progress a voluntary agreement. Up until this meeting, the Applicant was unable to settle an outstanding

ExQ	Respondent	Question	Applicant's Response
			matter of professional fees with the affected party's land agent, this issue has now been settled through the Applicant offering reimbursement up to a specified limit of time incurred to date. **Jackie Greenhill, Andrew Greenhill – BoR Plot numbers - 07-041, 07-042, 07-043, 07-044, 07-045** The Applicant has been engaging with the landowners within the Project red line boundary to reach voluntary heads of terms agreements. As this interest is a tenant of an affected landowner, the Project has adopted the position that engagement with this party will be undertaken post consent. The nature of these discussions around any surrender, compensation and opportunities is clarified further in the Applicant's response to CA1.27 in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** and is relevant to the wider points made around tenancies in the response below to CA2.6. **Bridget Marie Gregory – BoR Plot numbers - 13-025, 13-037, 14-001, 14-002, 14-003, 14-005, 14-005a, 14-023** The Applicant has been engaging with the landowners within the Scheme Order limits to agree the heads of terms for the voluntary agreements. As this interest is

ExQ	Respondent	Question	Applicant's Response
			a tenant of an affected landowner, the Scheme has adopted the position that engagement with this party will be undertaken once agreement has been reached with the landowner. **Claire Burgess, Clyde Stanley Burgess – BoR Plot number - 09-010** The Applicant has been engaging with the landowner's agent since June 2025 and negotiations in respect of an overarching voluntary agreement has progressed to one final clause outstanding. An overarching voluntary agreement is being sought in this instance, due to the landowner's appointed agent also representing other interests within the Order Limits The Applicant is now arranging meetings to discuss these terms with the individual affected parties. The Applicant is committed to agreeing voluntary agreements and has negotiated in a fair and reasonable manner looking to accommodate the land agent's requests where practicable. **John Baillie – BoR Plot number - 05-033, 05-039, 05-042** The Applicant has been engaging with the landowner's agent since June 2025 and negotiations in respect of an overarching voluntary agreement has

ExQ	Respondent	Question	Applicant's Response
			progressed to one final clause outstanding. An overarching voluntary agreement is being sought in this instance, due to the landowner's appointed agent also representing other interests within the Order Limits. The Applicant last met with the affected party in February 2026 to discuss and address concerns raised in relation to the voluntary heads of terms. These key points were noted in the meeting minutes and then subsequently actioned and addressed. An example of one of the concerns that was actioned is the distribution of a plan showing a reduction in the option area following the undertaking of surveys, requested by the affected party. The Applicant is committed to continue efforts to securing voluntary agreement. The Applicant wrote to the affected party on the 8 July 2026 offering to meet with the landowner to discuss the site specific requirements to progress a voluntary agreement. **KMT Farming and Consultancy on behalf of Mr and Mrs Eavis – BoR Plot numbers - 05-043, 06-003, 06-004, 06-005, 06-006** The Applicant has been engaging with the affected party and their appointed land agent consistently and collaboratively since the distribution of populated voluntary Heads of Terms on 11 September 2025 in

ExQ	Respondent	Question	Applicant's Response
			order to reach a voluntary agreement. The Applicant has worked collaboratively to address the specific concerns raised in the Heads of Terms by both the affected party and the appointed land agent through. The Applicant has evidenced this collaboration to address site specific concerns through the distribution of tracked changes in the Heads of Terms and regular meetings to discuss changes. The Applicant has addressed concerns relating to the extent of the option area and the use of the access track during operation. **Andrew Rowell – BoR Plot number – Not included** The Applicant notes that this interest has a freehold plot outside of the Order limits, therefore no compulsory acquisition powers are being sought over this plot. Should the interest hold an additional interest that is located within the Order limits, the Applicant requests detailed evidence is submitted showing this. **Carter Jonas for Messrs Nicholas – BoR Plot numbers - 16-011, 16-012, 16-013, 16-014, 16-015** The Applicant has been engaging with the landowner's agent since September 2025 and progress has been limited since March 2026 due to an issue relating to payment of the

ExQ	Respondent	Question	Applicant's Response
			land agent's professional fees. Demonstrating the Applicants commitment to securing a voluntary agreement, the Applicant offered reimbursement up to a specified limit of time incurred to date in appreciation of financial burdens. The Applicant acknowledges that a key concern from the affected party is the option area which is larger to account for the connection point into the grid and the Applicant has provided justification on the size of the area on page 2095 reference CJMN-001 in the DCO document **The Applicant's Response to Relevant Representations (Part 1) [PDA-009]**.
CA2.5	Any Affected Persons	**Negotiations Q2** In light of ExQ2 CA2.4 put to the applicant, the ExA invites affected persons to submit comments at deadline 6 (Friday 21 August 2026) on the applicant's response to that question. Affected persons may, at the same time, wish to summarise their unresolved positions on the implications of the CA and Temporary Possession powers affecting their land, their rights or their businesses (although note that there is no need to repeat previous submissions	N/A

ExQ	Respondent	Question	Applicant's Response
		which have been submitted into the examination).	
CA2.6	The Applicant	**Continuance of Farming** At CAH1 the ExA asked the applicant to what extent the applicant would be assisting tenant farmers/ leaseholders look for alternative land should those affected persons wish to continue farming in the area. The applicant explained that under the terms of the contractual arrangements, responsibility rests with the landowner, although the applicant is providing assistance through reimbursement of legal fees and support with administrative requirements. However, the applicant clarified that if CA powers are exercised then the responsibility would rest with the applicant. The applicant is asked to explain how these responsibilities have been communicated with the tenant farmers/ leaseholders so that they are aware of what assistance is available to them.	The Applicant confirms that responsibilities regarding the potential displacement of farming activities are communicated to tenant farmers and leaseholders through direct engagement and ongoing negotiations between the relevant landowner and the tenant supported by the Applicant and their professional agents. The Applicant confirms that the specific tenancy arrangements for each of the Solar PV Sites remain private agreements between landowners and tenants; however, a number of tenancy surrender arrangements including compensation and alternative land swaps have already been agreed, or are in the process of being discussed. Landowners of land with existing farming tenants are committed to offering suitable compensation for the remainder of applicable tenancy periods, providing tenants with the commercial opportunity to secure alternative land of a similar agricultural quality and productive yield. The landowner is being supported by the Applicant in this regard. Furthermore, the Applicant is facilitating information regarding Scheme associated opportunities such as management contracts and

ExQ	Respondent	Question	Applicant's Response
			alternative land negotiations to ensure those who wish to continue farming in the local area can do so. Additionally, the Applicant is actively supporting affected parties through the reimbursement of reasonable legal and professional fees and assistance with relevant administrative requirements, so that parties are properly advised and able to consider the available options. The Applicant's preference is for voluntary agreements to be reached between landowners and their respective tenants, as has been the case where agreements have already been reached. The Applicant recognises that this position will continue to evolve as the Scheme programme progresses, and potential new land becomes available. Where contract farmers are managing the land, as opposed to formal tenancies, the Applicant understands these contracts may be altered (by agreement) toward activities related to the Scheme's operation and management, such as ecological maintenance. These contracts are typically offered to landowners and tenants or contractors on a first refusal basis.

ExQ	Respondent	Question	Applicant's Response
			For those whose livelihoods may be more directly impacted, the Applicant offers further support through the reskilling and re-employment measures secured in the **Outline Skills, Supply Chain and Employment Plan (SSCEP) [APP-285]**. Though not anticipated based on current positions, should compulsory acquisition powers need be exercised, the Applicant clarifies that the legal responsibility for any compensation due to the tenant would rest directly with the Applicant. Paragraph 12.2 of the **Statement of Reasons [APP-018]** refers affected parties to the Government booklets which provide further information on the entitlement to compensation. Guide 3 relates to agricultural owners and occupiers.
CA2.7	The Applicant	**Notice Period for Temporary Possession (Article 31 of Draft Development Consent Order)** Article 31(3) of the draft Development Consent Order (dDCO) requires only 14 days' notice to be given to a landowner/ occupier before entering on and taking temporary possession of land. The ExA notes that the notice period	The Applicant refers to its response to CA1.11 in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**. The Applicant retains its position that the nature and use of the land included in the Scheme is similar to that on Cottam Solar Project and West Burton Solar Project where the Secretary of State considered 14 days' notice to be appropriate.

ExQ	Respondent	Question	Applicant's Response
		included in other made Orders (not least The Springwell Solar Farm Order 2026, The Dean Moor Solar Farm Order 2026, and The Peartree Hill Solar Farm Order 2026) is 28 days. The applicant is requested to replace 14 days with 28 days in its next revision of the dDCO or justify why a shorter period is appropriate in this case.	The Applicant cannot comment on why the promoters of those solar projects referred to considered that 28 days' notice was appropriate for those projects.
CA2.8	The Applicant	**Restoration of Drainage Associated with Temporary Possession of Land** In ExQ1 CA1.13 the ExA enquired about the powers in Article 31(5)(a), which allow the undertaker not to have to reinstate certain structures, plant vegetation and drainage, etc. which may be removed from land during construction of the scheme, and whether those powers are proportionate having regard to the potential impacts on affected persons. The applicant's response that a blanket reinstatement obligation may not be appropriate in all cases is noted [REP3-128], however, at CAH1 the matter of drainage was raised by several affected	The Applicant confirms that the purpose of the wording added to Table 5 of the **Outline Construction Environmental Management Plan [REP4-049]** is to ensure that agricultural drainage affected by the works continues to perform its existing function following reinstatement even if it is reinstated in a different location or an alternative drainage solution is provided as part of the works. The Applicant does not consider that there is any conflict between the commitments in the management plans and Article 31(5)(a) of the draft DCO. The powers in the draft DCO are subject to any commitments in the management plans. To provide the further assurance requested by the ExA, the **Outline Construction Environmental Management Plan [EN010168/APP/7.12]** (Revision 6) has been updated at Deadline 5 to state:

ExQ	Respondent	Question	Applicant's Response
		persons, who were concerned that existing drainage may be altered/ removed or would not perform the same function when the land is handed back. The applicant's representative explained that the heads of terms contain drainage provisions, including a commitment to appoint an independent drainage consultant to assist with the design process. The applicant also clarified that there was a commitment in ES Chapter 11 (Hydrology, Flood Risk and Drainage) for an independent drainage engineer, whilst also agreeing to look at whether some additional wording could be included in the outline Construction Environmental Management Plan, such that there would be reassurance that concerns would be addressed if an affected party did not want to sign the voluntary agreement. The ExA has reviewed the latest version of ES Chapter 11 [REP4-012] and could not find any reference to affected persons being able to avail themselves of the services of an independent drainage	*Before commencement of the relevant works, existing agricultural drainage infrastructure that may be affected will be identified and recorded through review of available information, consultation with the affected landowner where reasonably practicable, and pre-construction inspection by a suitably qualified and experienced agricultural drainage specialist appointed by the Applicant.* *Where agricultural drainage is disturbed by the works, the specialist will advise on its protection, reinstatement, diversion or replacement so that the affected drainage function is maintained. Following completion of the relevant works, the affected drainage will be inspected to verify that the required works have been completed and any identified remedial works will be undertaken as soon as reasonably practicable.* The Applicant also recognises that some drainage defects may not become apparent immediately following completion of the works. The **Outline Operational Environmental Management Plan [EN010168/APP/7.13]** (Revision 6) has been updated at Deadline 5 to include the following provision:

ExQ	Respondent	Question	Applicant's Response
		engineer, but in any event the ExA considers that any such commitment, along with a commitment to inspect existing drainage infrastructure pre and post construction, is best placed in a management plan, which the Council would have to approve. 1. The ExA acknowledges that the heads of terms may contain a commitment to appointing an independent drainage engineer, but not all affected persons have signed heads of terms, so some additional drafting should be put forward into the oCEMP. 2. As was highlighted at CAH1, damage done to drainage, particularly on agricultural land, may not become apparent for several years after the temporary use and hand back of the land, and there needs to be some recourse available to the landowner(s) at that time for any drainage damage to be rectified.	*Where evidence of a suspected agricultural drainage defect attributable to the construction of the Scheme is identified following reinstatement, the affected drainage will be inspected by a suitably qualified and experienced agricultural drainage specialist. Where the defect is confirmed to result from the construction works for the Scheme, proportionate remedial works will be undertaken to restore the affected drainage function.* These provisions apply to all agricultural drainage affected by the Scheme and are not dependent on the completion of a voluntary land agreement. They provide for pre-construction recording, appropriate reinstatement or replacement, post-construction verification and investigation of potential latent defects. The Applicant has provided drainage provisions within the Heads of Terms. These include a commitment that the Applicant will appoint an independent drainage contractor, prior to commencing the installation works. The purpose of that contractor is to carry out all necessary works to facilitate the installation of the cables and ancillary apparatus, minimising effects to the existing drainage system. These works include, but are not exclusive to surveys, records of

ExQ	Respondent	Question	Applicant's Response
		The applicant is therefore requested to consider whether recourse provisions should be included in the outline Operational Environmental Management Plan (oOEMP). 3. The ExA also seeks clarity on how an independent drainage engineer would be appointed, by whom, when and at whose cost? Notwithstanding the above questions, the ExA continues to be concerned about the powers in Article 31(5)(a) not to reinstate any drainage removed if the landowner requires it. The ExA notes that Revision 5 of the oCEMP [REP4-049] has included some additional text in Table 5, which states: *Within the cable installation working width, existing agricultural field drains identified in consultation with the landowner prior to the start of the relevant works, or encountered during those works, will be recorded. Where such drains are disturbed by the cable*	condition, designs and modifications to those existing drainage systems. The Applicant is committed to leaving the drainage in no worse position than before the installation works were carried out, as far as is practicable. The Applicant has committed in the Heads of Terms to permit the landowner to inspect any drainage works whilst they are in progress, and prior to them being backfilled, subject to any health and safety measures that are in place at the time. The Applicant understands the importance of drainage across agricultural land and so wishes to work with the landowners throughout the process to ensure that drainage is not adversely impacted, and the land can be returned to the landowner and used in the same manner as it was prior to the installation works. The Applicant recognises that drainage defects can occur some time after the installation works are complete, and the land fully reinstated. If, following a competent maintenance of the drainage system by the landowner, a defect is identified then the landowner has several options of recourse available to them.

ExQ	Respondent	Question	Applicant's Response
		installation works, they will be reinstated, diverted or otherwise made good following completion of the relevant section of construction so as to maintain the affected field drainage function. 4. The ExA seeks to understand from the applicant if there are any contradictions between Article 31(5)(a) not to reinstate any drainage and the monitoring and mitigation measures now included in Table 5 of the oCEMP.	Should the drainage defect identified result in a loss that is directly attributable to the installation works, follows a competent schedule of ongoing management and maintenance by the landowner, then they would be able to make a claim for compensation. The landowner would be able to make a claim under Compensation Code (which includes the Land Compensation Act 1961, the Compulsory Purchase Act 1965 and or the Land Compensation Act 1973). Examples of losses that the landowner might suffer could include crop loss, loss of yield over the affected area, or costs attributed to remediating the defect. Whilst the landowner has the ability to make a claim for compensation under the relevant pieces of legislation, it is the Applicant's preference to work collaboratively with the landowner to resolve issues. The Applicant considers that the drainage provisions within the Heads of Terms and the outline management plans are suitable and proportionate. The Applicant will work with all landowners (regardless of whether a voluntary agreement has been entered into) in the lead up to and throughout the installation works. This is to ensure that the eventual drainage system designed is fit for purpose and minimises the

ExQ	Respondent	Question	Applicant's Response
			possibility of it being defective so far as is practicable.
CA2.9	The Applicant	**Scope and Purpose of Rights and Powers Sought** In ExQ1 CA1.8 the ExA asked why the inclusion of Article 25, paragraph (4), which was inserted into Revision 2 of the dDCO [REP1-008], was necessary. The applicant's position [REP3-128] is that there may be circumstances where the permanent acquisition or extinguishment of a private right or restrictive covenant is necessary, and that unlike paragraphs (1) – (3), which operate automatically, paragraph (4) is a notice-based mechanism which requires the applicant to make deliberate action to extinguish a right or covenant. The ExA is struggling to comprehend a situation where the powers in paragraph (4) would be necessary in addition to the powers already contained in paragraphs (1) – (3), particularly as paragraphs (1) – (3) all state that the powers of	(1) As set out in the Applicant's response to CA1.8, the proposed drafting is actually more beneficial to the holders of private rights as it requires the Applicant to proactively extinguish such rights where required. For example, the drafting in Article 25(1) of the Dean Moor Solar Farm Order 2026 states that all private rights are automatically extinguished without justification regardless of whether they are inconsistent with the exercise of the powers in Article 21. Colloquially known in a compulsory purchase order context as "wiping the title clean". The Applicant's proposed drafting only automatically extinguishes rights that are inconsistent and a notice must be served to extinguish any other rights. For example, there may be a restrictive covenant that is not automatically breached by the Scheme (and therefore not inconsistent). The Applicant would have the choice to allow the restrictive covenant to continue or to extinguish it (for example, to remove any debate over whether it will be breached in the future) and pay compensation.

ExQ	Respondent	Question	Applicant's Response
		extinguishment of rights or covenants would only apply insofar as the continuance of those rights or covenants would be inconsistent with the exercise of compulsory acquisition powers. Thus, it seems to the ExA that the inclusion of paragraph (4) provides carte blanche powers for the undertaker to permanently extinguish rights or covenants over any land subject to compulsory acquisition powers (permanent or temporary) without justification or necessity, irrespective of the included notice provision. The ExA also notes that paragraph (4) does not feature in other recently made Orders, such as The Springwell Solar Farm Order 2026, The Dean Moor Solar Farm Order 2026, or the Peartree Hill Solar Farm Order 2026. **1.** As a result, the applicant is required to fully justify why retention of Article 25, paragraph (4) is necessary and how the powers contained in sub-	(2) The Applicant does not consider that the drafting is inconsistent or would interfere with any other Articles. Compensation remains payable for any extinguishment or interference with private rights.

ExQ	Respondent	Question	Applicant's Response
		paragraphs (1) – (3) are not sufficient. **2.** If retention of Article 25 paragraph (4) is considered and evidenced to be necessary, the applicant is asked to explain whether its powers would interfere with any of the provisions or requirements in Article 27 (Power to override easements and other rights), particularly compensation requirements?	
CA2.10	The Applicant Grenergy Renewables UK Limited	**Grenergy Renewables UK Limited – Plot 15-014** Grenergy Renewables UK Limited's interest in Plot 15-014 on the Land Plans [REP1-004] was included in the Book of Reference at deadline 3 [REP3-009]. Grenergy advised at deadline 3 [REP3-156] that it had met the applicant's team and the parties agreed to seek to enter into a cooperation agreement to resolve Grenergy's concerns, but that a	The Applicant confirms that it has met with Grenergy's project team and remains committed to working collaboratively to enable both the Scheme and Grenergy's proposed BESS development to be brought forward. A draft cooperation agreement is being prepared and will be provided to Grenergy's representatives. However, there has been disagreement regarding fees, as the Applicant considers Grenergy's demands to be unreasonable, particularly given that the Applicant is providing the

ExQ	Respondent	Question	Applicant's Response
		draft agreement was awaited from the applicant's team. Can both parties please update the ExA on the state of discussions between the parties.	substantive undertaking required to put the agreement in place. The Applicant has proposed a further option to resolve this issue and is awaiting a response from Grenergy. Once resolved, the cooperation agreement is expected to be straight forward given any interaction is limited to the laying of connection cables for both projects.
CA2.11	The Applicant	**Different Types of Agreements** The ExA seeks clarification on the difference between several terms that have been used in the various representations and submissions: such as options agreement, voluntary agreement, lease agreement and heads of terms. Provide an explanation in writing, the sequence in which these agreements might be reached during the DCO process and their status in the DCO process, clearly identifying which would be considerations in the examination, and which would be negotiated outside the scope of the examination; or signpost where this explanation can be found.	The terms option agreements, voluntary agreement, lease agreement and heads of terms describe the different stages and forms of land rights negotiations between the Applicant and affected persons. They are distinct from the compulsory acquisition powers sought through the DCO. <u>Heads of Terms</u> Are a non-binding document that outline the commercial and non-commercial terms agreed in principle between parties. They provide the framework for the preparation of a formal legal agreement but do not constitute a binding obligation to transfer or grant rights in land as a standalone document. <u>Option agreement</u>

ExQ	Respondent	Question	Applicant's Response
			A legally binding agreement under which a landowner grants the Applicant the ability to acquire specified land or rights at a future date, for example following the grant of a DCO. The Option agreement will include the agreed form of lease or deed of easement. For the Solar PV Sites, the Applicant has entered into Option agreements to take a lease of the land. For the cable route corridor, the Applicant will enter into an Option to take an easement. Lease A legally binding agreement granting exclusive possession of land or property for a term of years in exchange for a consideration. Leases can also include the grant of rights (easements) for access and cables. Deed of Easement A legally binding agreement granting rights and imposing restrictions over land that remains the property of the landowner. An easement is typically used to obtain the rights required for the cable route corridor and access. Voluntary agreement

ExQ	Respondent	Question	Applicant's Response
			A collective term for any privately negotiated legal agreement entered into including an option agreement, lease and easement. During the pre-application stage of a DCO, it is common for the Applicant to enter negotiations for Heads of Terms. The negotiations for Heads of Terms remain ongoing and progress throughout examination of the DCO application. Once Heads of Terms are agreed, both parties will appoint legal representatives to negotiate and agree the option agreement. If the DCO is granted, the option will be exercised and the lease or deed of easement completed. Going forward, where any Heads of Terms are agreed for the cable route corridor, the Applicant considers it unlikely that the option agreements will be agreed and completed prior to the end of the Examination given the time required to negotiate and enter into the documents.

ExQ	Respondent	Question	Applicant's Response
CA2.12	The Applicant	**Other Consents and Agreements** Section 11 of the Statement of Reasons [APP-018] states that the applicant requires or may require various other consents, as well as a DCO, in order to build and operate the Scheme and has set this information out in The Consents and Agreements Position Statement [APP-272]. Please indicate whether there are any changes to the status for each consent, licence and agreement listed within the Position Statement since the application was submitted, or if any additional consents, licences and agreements need to be added.	The Applicant confirms that there are no updates or changes to the consents, licences and agreements listed in the **Consents and Agreements Position Statement [APP-272]**. Furthermore, there are no additional consents, licences or agreements that need to be added.

2.4 Climate Change

Table 2-4 Climate Change

ExQ	Respondent	Question	Applicant's Response
CC2.1	The Applicant	**Sulphur Hexafluoride (SF_6)** The recent Secretary of State (SoS) decision for The Peartree Hill Solar Farm Order 2026, secures the commitment from the applicant to avoid the use of SF_6 in switchgear components. This was secured in that applicant's Design Parameters Document. Furthermore, the same commitment was provided in ES Chapter 14: Carbon and Climate Change of The One Earth Solar Farm Order 2026**.** The approach is supported by NPS EN-5 paragraphs 2.9.59 to 2.9.64, 2.10.14, 2.10.15 and 2.11.17. The applicant is requested to make the same commitment and update the necessary documents. If it cannot make the same commitment, then it should provide an explanation as to why not.	The Applicant confirms it is proactively seeking to minimise the use of SF6 and can confirm that the BESS units, inverters, transformers, and control panels will not contain SF6. Furthermore, at lower voltages (below 33kV), there is no anticipated need for equipment containing SF6, and its use is to be avoided in these components. These commitments will be reflected in an updated **Outline Operational Environmental Management Plan (OEMP)** to ensure they are legally secured through the DCO. The Applicant will consider how these commitments will be reflected in the **Outline OEMP [REP4-051]** at a future deadline. The Applicant will prioritise the procurement of SF6-free equipment where practicable and the selection of AIS equipment in the electrical design already dramatically reduces the need to use SF6 compared to alternative configurations. However, a full commitment to SF6-free technology

ExQ	Respondent	Question	Applicant's Response
			for high-voltage applications currently carries a delivery risk. Forthcoming European guidance is expected to introduce a permanent ban on the use of SF6 in new installations by 2035. The UK is expected to follow suit as part of its net zero ambitions. Prior to 2035, interim bans are expected to apply at certain voltage levels, including a ban from 2032 on equipment rated above 142 kV. As the Scheme holds a Gate 2, Phase One offer, any such restrictions would come into effect after the Scheme has been connected. Consequently, procurement of the Scheme's components could begin two to three years before the connection date. Following a review of the supply chain, both presently and at the point of procurement for the Scheme, the Applicant does not have sufficient confidence that SF6-free alternatives will be prevalent or established across all required high-voltage specifications to guarantee that the Scheme can be delivered within the necessary timeframe, given there are a number of years until any restrictions come in force, and the market wholly aligns with this.

ExQ	Respondent	Question	Applicant's Response
			The Applicant is unable to comment on other schemes and the commitments stated, however it is not considered that a blanket commitment to completely avoid SF6 in all switchgear components to be appropriate for this Scheme at this time given the timeframes, connection date, and its confidence as to the availability of SF6-free alternatives. To be clear, SF_6 free equipment will be prioritised, and any potential use of SF_6 would be strictly confined to specific items of electrical switchgear, circuit breakers, and Air Insulated Switchgear (AIS) equipment operating between 33kV and 400kV. Should SF_6 be ultimately present in minor quantities, this would be documented in the final equipment inventory approved by the local planning authority.
CC2.2	The Applicant	**Climate Change/ GHG Emissions Calculations** The Universities of Derby and Exeter, through submissions by Stop Lime Down [REP1-182] and Wiltshire Council [REP1-138] respectively, advocate the use of Environmental Product Declarations (EPDs) to calculate greenhouse gas (GHG) emissions and derive a carbon payback	**ES Volume 1 Chapter 20: Other Environmental Matters [APP-072]** (Revision 2) has been updated in response to the increase in panels to reflect the updated calculations. This has been submitted at Deadline 5. As requested, the Applicant has provided a rebuttal to Stop Lime Down's revised HGV Trip Generation

ExQ	Respondent	Question	Applicant's Response
		period. The applicant rejects this approach [REP3-132]. However, a similar methodology was adopted in the recent Development Consent Orders (DCOs) for The Peartree Hill Solar Farm Order 2026, The One Earth Solar Farm Order 2026 and The Springwell Solar Farm Order 2026. In those cases, carbon payback periods were provided, with The Peartree Hill Solar Farm Order 2026 estimating a payback period of 13 years, while both The One Earth Solar Farm Order 2026 and The Springwell Solar Farm Order 2026 reported payback periods of approximately 3 years. Although there is no universally accepted method for assessing the carbon impact of solar developments, a commonly used approach is to present a straightforward carbon payback figure. This is typically derived using a combination of EPDs, peer-reviewed scientific literature, and carbon assessment tools such as One Click Life Cycle Assessment. The provision of a payback year is clearly an approach the SoS has accepted in other DCOs, but it is acknowledged that it has	Report included in **Appendix A [REP4 132]**. This has been submitted at Deadline 5. Trip generation calculations have been updated to provide more detail. It also demonstrates that the number of calculated deliveries has the potential to deliver up to 842,000 panels if using High Cube Containers. **ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1]** (Revision 2), submitted at Deadline 5, has also been updated to account for up to 842,000 solar panels in a fixed array, and compared against a scenario with 598,260 tracker panels. The assessment has applied appropriate guidance and emissions data, including example EPD's and DESNZ Greenhouse Gas Reporting Conversion Factors. When compared with a CCGT, Lime Down has a payback year of less than 3 years of operation for both fixed and tracked panels; this is when the proposal will save more GHG emissions than it took to implement and periodically replace the main components of the development.

ExQ	Respondent	Question	Applicant's Response
		not been provided in all cases, for example The Dean Moor Solar Farm Order 2026. Nevertheless, the applicant is asked to respond to the following: **1.** Given the detailed assessments submitted by Wiltshire Council and Stop Lime Down that query the climate benefits, the applicant is asked to provide its own payback figure, i.e. when the proposal will save more GHG emissions than it took to implement and periodically replace the main components of the development. However, it is appreciated that this is not necessarily an exact science and the applicant's deadline 3 submission [REP3-132] is noted. **2.** In addition to the provision of a payback figure, the applicant is requested to respond fully to the comments from Stop Lime Down's deadline 4 submission [REP4-132] table 2.1 pages 172 – 176. We suggest that an additional column to this table would be the clearest	

ExQ	Respondent	Question	Applicant's Response
		method to provide this information and inform the ExA of the exact areas of disagreement. **3.** Finally, the applicant is asked to confirm the maximum number of solar PV panels they expect to install. ES Chapter 7 [APP-059] provides a figure of 598,260. However, at deadline 3, the applicant's Climate Change Sensitivity Assessment Report [REP3-132] stated that *a notional figure of approximately 842,000 panels has been assumed, which reflects an estimated maximum achievable installed capacity of the Scheme within the defined design parameters*. Furthermore, the applicant cited a figure of 864,000 at Issue Specific Hearing 3 (ISH3) during the discussion on HGV trips. The applicant is asked to explain this difference, update the relevant documentation using the correct figure and clarify that it has informed the climate change assessment.	

2.5 Cultural Heritage

Table 2-5 Cultural Heritage

ExQ	Respondent	Question	Applicant's Response
CH2.1	The Applicant	**Geophysical Survey for the Cable Route Corridor** The applicant is asked to provide an update of the outstanding Geophysical Surveys for the CRC. If the results of the outstanding surveys will not be completed within the timeframe of the examination, the applicant is asked to set out what controls would be put in place in the control documents and dDCO to ensure that archaeological impacts are adequately dealt with.	The outstanding geophysical survey report was issued to Wiltshire Council and Historic England on the 15th July and will be submitted at Deadline 5. **ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]** has been updated following a meeting with Wiltshire Council on 27th July. An updated version will be submitted at Deadline 6, following consultation with Historic England.
CH2.2	Wiltshire Council	**Concrete Feet** The ExA note that in Wiltshire Council's relevant representation [RR- 4934] it states that Wiltshire Council Archaeology Service (WCAS) is not supportive of the use of concrete feet as it is considered that is too much risk for impacts upon sub surface archaeology from construction directly over it without mitigation. It also states that	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		WCAS would wish to see panels located away from features in these circumstances so that any impact can be avoided. Is Wiltshire Council able to specify any locations where concrete feet would not be appropriate and where it considers solar PV panels should be removed from the proposed development to prevent unacceptable impacts on sub surface archaeology?	
CH2.3	Stop Lime Down	**Direct Impacts to the Fosse Way** Wiltshire Council's response [REP2-046] to Stop Lime Down's concerns regarding the direct impacts on the Fosse Way stated that: *Wiltshire Council Archaeology Service (WCAS) considers that there is no direct impact on the Roman road itself, which has already been heavily impacted by modern road construction. Its relationship to the archaeological sites identified by the geophysical survey will remain unchanged if the solar farm is constructed, as the*	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		heritage assets to the southeast of the road are sub-surface features, so there will be no visual impact to their relationship, which is purely spatial. Those sites impacted by development will be preserved by record, knowledge which will add to understanding of the landscape. Stop Lime Down is asked to respond to this and confirm if it maintains that there would be a direct moderate adverse (significant) effect on the Fosse Way?	
CH2.4	The Applicant	**Scheduled Monument - Pillow Mound** In Appendix C to its written representation (WR) [REP1-171], Stop Lime Down state that a reasonable worst case for the scheduled monument 'Pillow mound 280m southwest of Surrendell Farm' would be that Horizontal Directional Drilling (HDD) is not viable in this location and a program of strip, map and sample (SMS) is undertaken. Stop Lime Down state that in this case, the residual effect of SMS would be moderate adverse (significant).	It should be noted that HDD is proposed within the cable corridor route to the west of 'Pillow mound 280m southwest of Surrendell Farm' (NHLE: 1018610). As such there are no direct impacts as a result of the Scheme to the Scheduled Monument. Geophysical survey within the cable corridor has not identified any buried archaeological features. HDD is being undertaken in this location as a precautionary mitigation measure. Historic England and Wiltshire Council are both in agreement with the approach to safeguarding designated heritage assets. Therefore, while in principle, the Applicant considers SMS a

ExQ	Respondent	Question	Applicant's Response
		1. Although the ExA note that the applicant has confirmed that HDD is currently proposed in this location [REP3-129], should a reasonable worst case for the assessment of effect on this asset be that HDD is not possible and that a program of SMS would be undertaken? 2. What would be the residual effect on this asset if SMS is employed in this location?	suitable alternative mitigation option to HDD, the Applicant considers HDD to be the better mitigation option at this location. The applicant understands the WC and Historic England agree in principle that SMS is a suitable alternative to HDD to mitigate archaeological remains within the cable route corridor. Given, no buried archaeological features have been identified at this location and there are not direct impacts to the Scheduled monument, the residual effect would be as assessed to the Scheduled Monument if SMS was undertaken.
CH2.5	Historic England	**Preservation by Record – Receptor D24-01** In Appendix C to its WR [REP1-171], Stop Lime Down state that preservation by record, through its nature mitigates harm, it does not eliminate it to the extent assessed by the applicant. As such, Stop Lime Down consider that for receptor D24-01 the residual effect would be moderate adverse (significant), and for other receptors such as C13-01 and C29-01 it would be moderate/ minor.	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		On the other hand, WCAS [REP2-046] consider that excavation of an archaeological site to Chartered Institute for Archaeologists (CIFA) and WCAS standards would substantially reduce the effect of impact upon archaeological sites of local and regional importance such that there would be a negligible adverse effect. Historic England is asked to comment on the extent to which preservation by record can reduce the direct adverse effect on archaeology at this receptor?	
CH2.6	The Applicant Wiltshire Council Historic England	**Evaluation Trial Trenching Reports and the Outline Archaeological Mitigation Strategy (oAMS)** The ExA note from the statement of common ground (SoCG) between the applicant and both Wiltshire Council [REP4-061] and Historic England [REP4-065] that full evaluation trial trenching reports have been shared with these parties. The Applicant:	Full evaluation reports were issued to Wiltshire Council on 28th May 2026 and Historic England on the 4th June. Reports are currently in the process of being updated in response to comments received (comments received 9th and 14th July 2026). The Applicant is currently waiting for a response from Historic England regarding a query to comments received. Once finalised evaluation trenching reports will be submitted into the examination (expected to be submitted at Deadline 6 once reports have been approved by Wiltshire Council and Historic England).

ExQ	Respondent	Question	Applicant's Response
		1. The applicant is asked to submit the full evaluation trial trenching reports into the examination. The Applicant, Wiltshire Council and Historic England: **2.** The parties are each asked to provide an update of any discussions that have been undertaken in relation to the evaluation trial trenching reports and any resultant changes that would need to be made to the oAMS or Requirement 12 of the dDCO.	**ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]** is being updated in response to the evaluation trenching and comments received from Historic England and Wiltshire Council. An updated version will be submitted at Deadline 6, following consultation with Historic England. The Applicant considers updates to **ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]** to be sufficient in providing mitigation for archaeological remains. As such no updates are proposed to Requirement 12.
CH2.7	The Applicant	**Direct Physical Impacts on Built Heritage** The ExA notes the applicant's response to ExQ1 CH1.11 [REP3-128]. The applicant is asked to confirm if the proposed routing of construction traffic set out in the outline Construction Traffic Management Plan (oCTMP) [REP4-057] removes the potential for swipes, strikes, or vibration from heavy goods vehicles and construction traffic to cause direct physical	The Applicant considers the proposed routing of construction traffic set out in the **Outline Construction Traffic Management Plan (CTMP) [REP4-057]** to have removed the potential for swipes, strikes, or vibration from heavy goods vehicles and construction traffic to cause direct physical impacts to heritage assets. As such no further mitigation measures are considered necessary to prevent direct impacts to heritage assets.

ExQ	Respondent	Question	Applicant's Response
		impacts to heritage assets? If not, the applicant is asked to expand on the measures that will be taken to prevent direct physical impacts to heritage assets?	
CH2.8	The Applicant	**Avil's Farmhouse (Grade II)** The applicant [REP2-039], in response to Stop Lime Down's WR [REP1-167], states that it welcomes Stop Lime Down's conclusion of a negligible adverse effect on Avil's Farmhouse. As this would be an increased residual effect from the neutral effect reported in appendix 12-8 of the ES [APP-232], the applicant is asked to confirm if there would be 'less than substantial harm' to Avil's Farmhouse?	The Applicant welcomes SLD conclusion that their identified adverse effect would be negligible adverse and therefore not significant in EIA terms, following SLD's statement *"The resulting significant effect on Avil's Farmhouse is identified to be Negligible adverse".* The Applicant's assessment concludes that there would be no harm to Grade II listed Avil's Farmhouse (NHLE 1022396).
CH2.9	Wiltshire Council	**Rodbourne Conservation Area** The SoCG between the applicant and Wiltshire Council [REP4-061] records Wiltshire Councils position that:	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		Amendments to the Outline CEMP [REP3-092] and Outline CTMP [REP1-112] intended to mitigate the impact on the Rodbourne Conservation Area via the involvement of the Conservation Officer in the design of the works does not provide any effective mitigation, as the design is unknown and there is no certainty that there will be a solution which can prevent the occurrence of harm. Wiltshire Council is asked if it can set out what further design information it would need to be provided with to enable the council to confirm whether or not there could be a potential design solution to mitigate the impact on the Conservation Area?	
CH2.10	Historic England Wiltshire Council	**Bradfield Manor Farmhouse (Grade I)** The ExA notes that the SoCG between the applicant and Historic England [REP4-065] records that the approach to safeguarding designated heritage assets is agreed. With regards to Bradfield Manor Farmhouse, the SoCG records that Historic England acknowledge that in winter the	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		screening would not be so effective and that in the longer distance views the harm caused by panels would not be mitigated. The SoCG records that Historic England consider that the panels would cause harm, but that harm would be less than substantial. Historic England: 1. Can Historic England confirm if it agrees with the applicant's assessment in the Heritage Statement [APP-219] that the harm to Bradfield Manor Farmhouse Would be at the lower end of the scale of less than substantial harm? Wiltshire Council: 2. Do Wiltshire Council agree with Historic England's position on Bradfield Manor Farmhouse? If not, please explain its position including any additional mitigation measures that would be necessary and the	

ExQ	Respondent	Question	Applicant's Response
		level of harm that Bradfield Manor Farmhouse would experience.	
CH2.11	Wiltshire Council The Applicant	**Grittleton House (Grade II*)** The ExA notes Wiltshire Council's response to ExQ1 CH1.16 that it considers more robust and effective management proposals need to be incorporated in the outline management plans which could assist in mitigating the impact from the scheme on the business and hence on the future viability and conservation of the asset. <u>Wiltshire Council</u>: 1. Wiltshire Council are asked to clarify whether its concern is in relation to an adverse socio-economic impact which may have an indirect impact on the conservation of the asset, or is it primarily an impact on the setting of the asset in heritage assessment terms which in turn	The Applicant undertook a site visit with Wiltshire Council on the 5th of May to the grounds of Grittleton House. Since then, discussions have continued regarding potential additional mitigation measures. A virtual meeting with the owners of Grittleton House is scheduled to take place during August 2026 to discuss these matters further, and the Applicant is also in the process of arranging a further site meeting with the owners during September 2026 to continue these discussions on site. The Applicant has not identified any harm to the significance of the heritage asset and considers the update to the CEMP at Deadline 1 (Table 6 of the **Outline Construction Environmental Management Plan [REP1-097]**) to provide appropriate commitment to minimise intervisibility between the asset and temporary, localised and reversible works associated with the installation of the cable route corridor.

ExQ	Respondent	Question	Applicant's Response
		impacts the economic viability of the business (or both)? The Applicant and Wiltshire Council: 2. Both parties are asked to provide an update of any further discussions that have taken place regarding further mitigation measures that could be put in place, while the applicant is asked to provide commentary on the level of engagement it has had with the owners of Grittleton House on this matter.	
CH2.12	The Applicant Wiltshire Council Historic England	**Adaptive Management of Mitigation** With regards to the approach to mitigation for built heritage, the SoCG between the applicant and Wiltshire council [REP4-061] records that Wiltshire Council consider that the deadline 3 updates to the oCEMP [REP3 092] in line with the outline Landscape and Ecological Management Plan (oLEMP) [REP3-100] do not include any proposals for monitoring or assessing the efficacy of the landscaping in	The **Outline Construction Environmental Management Plan [REP4-049]** has been updated to clarify that monitoring of landscape mitigation planting will be undertaken in accordance with the **Outline Landscape and Ecological Management Plan** (LEMP) **[REP3-100]**. The **Outline LEMP [REP3-100]** secures the establishment, maintenance and replacement of planting to ensure that the approved landscape mitigation is successfully implemented and maintained over time.

ExQ	Respondent	Question	Applicant's Response
		providing the mitigation envisaged or for making amendments if required in the future. The Applicant: 1. The applicant is asked to review and respond with proposed measures for the adaptive management of mitigation. Wiltshire Council and Historic England: 2. Wiltshire Council and Historic England are asked to propose any changes that should be made to the management plans to secure adequate monitoring, assessment of efficacy and adaptations to the mitigation measures as they deem necessary.	The Applicant considers that the mitigation and monitoring measures secured through the **Outline Construction Environmental Management Plan [REP4-049]** and **Outline LEMP [REP3-100]** are appropriate and proportionate to the level of effect identified in the Environmental Statement and are sufficient to safeguard heritage assets. As such the Applicant does not consider a heritage-assessment during the operation phase is required to assess the efficacy of the proposed landscape mitigation. The Applicant notes that adaptive management of mitigation is not typically required for other comparable solar schemes. Furthermore, the assessment has not identified any assets, or impacts to assets, for which such an approach is considered necessary. The **Outline LEMP [REP3-100]** sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the **Outline LEMP [REP3-100]**, is secured

ExQ	Respondent	Question	Applicant's Response
			through Requirement 7 in Schedule 2 of the **Draft DCO [REP4-004].**
CH2.13	The Applicant Wiltshire Council Historic England Stop Lime Down	**Noise Impacts** In response to Stop Lime Down's WR [REP1-167], it is noted that the applicant states [REP2-039] that the noise impact on built heritage assets has been assessed to not constitute a significant effect on health and quality of life. The applicant is asked whether the significance of effect on health or quality of life is an appropriate threshold for determining whether noise from the proposed development would have an adverse impact on the setting of heritage assets or whether noise can have a significant effect on the setting and understanding of a heritage asset without crossing the threshold of significance for health or quality of life? In response, please provide references to any relevant guidance.	When considering the assessment of harm to heritage assets as a result of indirect impacts, consideration has been given to changes in background noise where it has the potential to alter the setting of an asset. Consideration has been given to the results of the noise assessment to aid in the identification of areas where there is a potential for an increase in noise levels as a result of the Scheme (for example modelling in **ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061]**). A contributing factor when considering the setting of an asset is how a human receptor appreciates or experiences a heritage asset and the immediate environment it is located within. As such health or quality of life are not as such a threshold for determining whether noise from the Scheme would have an adverse effect on the setting of a heritage asset and the Applicant agrees that noise can affect heritage setting without causing a significant health or quality-of-life effect.

ExQ	Respondent	Question	Applicant's Response
		Wiltshire Council, Historic England and Stop Lime Down may also wish to comment on this matter.	The heritage assessment did not rely solely on the results of the noise assessment. The conclusions of the noise assessment were reviewed to understand the potential for significant noise -based effects on receptors and whether there were any locations where the acoustic environment of heritage assets would be altered to an extent that could cause an impact to their significance, appreciation or understanding. This is in line with Historic England Guidance *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition* (https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/), which recognises *"the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise…"*
CH2.14	The Applicant	**Heritage Viewpoints** The applicant is asked to provide a wireframe outline of the proposed development in the views from Bradfield Manor Farmhouse, and the	Wireframe visualisations have been prepared and can be found in Appendix 1 of the **Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54].**

ExQ	Respondent	Question	Applicant's Response
		viewpoint photography looking west from Farleaze Farm towards Lime Down C as requested by Wiltshire Council in its response to ExQ1 CH1.2 [REP3-142].	Wireframe illustrations have been provided using existing photographs taken during the site visit to Bradfield Manor in May 2025 and a site visit to Farleaze Farm on the 29th July 2026. As such the position / height / tilt of the camera has been established using available terrain data and maps to estimate locations and heights of nearby objects (hedges, trees, posts). A blue hatched box indicates the location and height of solar panels. A dashed line shows the location of panels which are screened by existing landscape features (i.e. vegetation).

2.6 Cumulative Effects

Table 2-6 Cumulative Effects

ExQ	Respondent	Question	Applicant's Response
CE2.1	The Applicant	**List of Cumulative Projects** The applicant is requested to consider whether planning application PL/2026/03545, as provided by Wiltshire Council [REP4-090], should be included in their long-list of cumulative developments. If so, please update the relevant documentation accordingly. If not, please provide an explanation.	The scheme identified forms part of allocation CH1 and has already been included and assessed as part of the short-listed schemes (ID 256 within Table 21-4 of **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]**). No cumulative effects were identified. Notwithstanding, PL/2026/03545 provides further detail and therefore has been further considered. The scheme is an outline planning application on the southern side of Chippenham for approximately 400 residential units together with mixed commercial, business and leisure use. It is located approximately 1.4km to the east of the Cable Route Corridor. On the basis of the scale, location and nature of the proposed scheme, interaction with the Lime Down Solar Park Scheme is limited to

ExQ	Respondent	Question	Applicant's Response
			construction traffic effects, should the construction programmes overlap. The Lime Down cable corridor construction traffic routes (page 53 of the **Outline Construction Traffic Management Plan [REP4-058]**) include the A350 which runs adjacent to the proposed development and Corsham Road approximately 1.6km to the south. Each cable route access point is expected to be used for a total of approximately 90 days (which need not be consecutive) over the construction phase with up to four accesses (one per 5.5 km section of the Cable Route Corridor) in operation at one time. The Cable Route Corridor will generate the following total number of trips on an average day (page 24-25 of the **Outline Construction Traffic Management Plan [REP4-058]**): • HGV – 16 deliveries (32 movements); • LGV - 16 deliveries (32 movements). • Construction worker arrivals (car/van) – 40 arrivals (80 movements).

ExQ	Respondent	Question	Applicant's Response
			These trips will be distributed around the local highway network and will be spread across 28 access locations. Given the short duration each cable access location will be in use, together with limited vehicle movements per day at a single location and adoption of the highway mitigation and management measures set out within the **Outline Construction Traffic Management Plan [REP4-058]**, no cumulative effects are identified.

2.7 Draft Development Consent Order

Table 2-7 Draft Development Consent Order

ExQ	Respondent	Question	Applicant's Response
Questions within this section refer to the dDCO updated at Deadline 4 [REP4-004] (clean version)/ [REP4-005] (tracked version)			
DCO2.1	All Interested Parties and Statutory Undertakers	**Residual Issues with the dDCO and Management Plans** The dDCO is an important document and the ExA is under a duty to provide the SoS with a recommended version of the DCO. This is because the SoS is the decision maker. Therefore, even if the ExA were to recommend to the SoS that development consent should not be granted, the ExA must still append a recommended version of the DCO, thus it is important that the ExA is able to put forward the best DCO that it can. The dDCO has been revised four times during the examination to date. A proportion of what has been requested by interested parties has been included in the Order, another proportion has been addressed through the updating of associated management plans, and other elements the applicant has resisted with reasons. While the position of many interested parties and/or statutory undertakers may be that	The Applicant welcomes comments from interested parties and statutory undertakers on the draft DCO and management plans, for consideration.

ExQ	Respondent	Question	Applicant's Response
		development consent should not be granted, without prejudice to your position, you are invited to: 1. Outline any remaining or residual issues that you have with any articles, requirements or schedules of the dDCO, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions you are seeking (including suggested redrafting if applicable) to address your concerns, and explain (make your case) why the applicant, the ExA and the SoS should consider such amendments to the dDCO. Statutory Undertakers are also alerted to ExQ2 DCO2.23 which specifically relates to protected provisions. 2. Outline any remaining or residual issues that you have with any of the management plans/ documents listed below, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions or amendments you are seeking to address your concerns within the drafting of the relevant management plan(s)/ document(s):	

ExQ	Respondent	Question	Applicant's Response
		• Outline Construction Environmental Management Plan (Latest Version, Revision 5 [REP4-049]) • Outline Operational Environmental Management Plan (Latest Version, Revision 5 [REP4-051]) • Outline Decommissioning Strategy (Latest Version, Revision 3 [REP3-096]) • Outline Soil Resources Management Plan (Latest Version, Revision 2 [REP3-098]) • Outline Site Waste Management Plan (Latest Version, Revision 2 [REP1-102]) • Outline Public Rights of Way and Permissive Paths Management Plan (Latest Version, Revision 1 [APP-282]) • Outline Landscape and Ecological Management Plan (Latest Version, Revision 2 [REP3-100]) • Outline Ecological Protection and Mitigation Strategy (Latest Version, Revision 4 [REP4-055])	

ExQ	Respondent	Question	Applicant's Response
		• Outline Skills, Supply Chain and Employment Plan (Latest Version, Revision 1 [APP-285]) • Outline Battery Safety Management Plan (Latest Version, Revision 3 [REP3-106]) • Outline Construction Traffic Management Plan (Latest Version, Revision 4 [REP4-057]) • Outline Archaeological Mitigation Strategy (Latest Version, Revision 1 [APP-230]) • Outline Drainage Strategy (Latest Version, Revision 4, [REP4-021, REP4-023, REP4-025, REP4-027, REP4-029, REP4-031, REP4-033, REP4-035]) • Outline Water Resources Strategy (Latest Version, Revision 1 [APP-290])	
DCO2.2	The Applicant	**Article 2 – Interpretation Q1** National Highways [REP4-098] has requested that a definition of relevant highway authority is required to be included in the dDCO. The applicant is asked to include such a definition or explain why it is not necessary.	Article 2 already includes the requested definition, with article 2(1) providing: *"highway" and "highway authority" have the same meaning as in the 1980 Act;* The term *"relevant"* is not defined as its meaning is readily understood.

ExQ	Respondent	Question	Applicant's Response
DCO2.3	The Applicant	**Article 2 – Interpretation Q2** In response to ExQ1 DCO1.5 [REP3-128] the applicant stated that it would prepare a permitted preliminary works (PPW) plan and submit this at deadline 4. The applicant's cover letter submitted at deadline 4 stated that the PPW plan would instead be submitted at deadline 5. The ExA requests that the first iteration of this document is submitted at deadline 5 and no later, so that there is reasonable opportunity for it to be reviewed, consulted on and updated as necessary at subsequent deadlines, and for the final version to be included as a certified document in the dDCO.	The Applicant confirms that the permitted preliminary works environmental management plan has been provided at Deadline 5.
DCO2.4	The Applicant	**Article 2 – Interpretation Q3** The definition of 'maintain' was considered in ExQ1 DCO1.3 and further discussed at ISH4. The ExA considered whether the definition should include the words *'but not remove, reconstruct or replace the whole of the authorised development',* particularly in light of the climate change chapter 7, which confirms that there is no anticipated replacement of mounting structures, interconnecting cable, grid connecting cable, or on-site	The Applicant has sought to progress the drafting to ensure that the Order for the Scheme is entirely consistent with the development proposed and assessed in the Environmental Statement. For example, the Environmental Statements for the West Burton Solar Project and the Cottam Solar Project did not assess the complete replacement of all solar panels or the BESS and therefore it was appropriate for those DCOs to limit the definition of maintain. The text that maintenance does not include removal, reconstruction or replacement of the

ExQ	Respondent	Question	Applicant's Response
		substation buildings, while only a 20% on-site cable replacement allowance has been made. The applicant's response is that the suggested words would conflict with the intention that the scheduled replacement of all solar modules and battery energy storage system units is permitted as maintenance for this scheme. The ExA notes that the indicative design life of solar panels put forward by developers in examinations is between 25 and 40 years, while indicative lifespans of batteries is between 5 and 15 years, meaning that any scheme with a 60 year life span would need to replace both components during the lifetime of those developments. This is the case for example in The Cottam Solar Project Order 2024, The West Burton Solar Project Order 2025, and The One Earth Solar Farm Order 2026, and yet all three of those made Orders include the following definition of maintain: *"maintain" includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of,* ***but not remove, reconstruct or replace the whole of, the authorised development*** *and "maintenance" and "maintaining" are to be construed accordingly;*	whole of the authorised development conflicts with the approach assessed in the Environmental Statement of replacing the solar panels and batteries within the lifetime of the Scheme. The Applicant considers that the removal of these words increases clarity and certainty that the scheduled replacements are permitted and constitute maintenance. The words within the definition do not provide an effective control mechanism (and it is noted that drafting best practice is to avoid including operative provisions within definitions), as maintenance of the Scheme is only authorised, by virtue of article 5(3), where it is not likely to give rise to any materially new or materially different effects that have not been assessed in the environmental statement. Accordingly, it is the Applicant's position that the wording highlighted by the ExA does not serve a drafting purpose (the control on the extent of maintenance that is authorised being found in article 5(3)), but that it could result in uncertainty over whether an activity, assessed within the

ExQ	Respondent	Question	Applicant's Response
		The ExA therefore has difficulty understanding why the inclusion of the words *'but not remove, reconstruct or replace the whole of the authorised development'* in the definition of 'maintain' for the Lime Down project is problematic. The applicant is asked to explain how this project is set apart from the three examples noted above to justify exclusion of the suggested words in the dDCO.	Environmental Statement, is authorised and permitted by the Order.
DCO2.5	The Applicant	**Article 6 - Disapplication and modification of legislation, etc.** Article 6 of the dDCO was revised at deadline 4 to include the following legislative modification: *(4) Regulation 3(2) of The Environmental Impact Assessment (Agriculture) (England) (No.2) Regulations 2006 has effect as though after sub-paragraph (b) there were added— (ba) constitutes development to which the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 apply;* The Schedule of Changes to the dDCO (Rev 3) [REP4-075] states that this corrects an issue whereby land would become uncultivated for more than 15 years whilst used for the projects, and the EIA Agriculture	In response to question EB1.1, from the ExA's First Written Questions, Natural England confirmed in its responses [AS-018] that, as the legislation currently stands, the land utilised for solar development would be considered uncultivated land. A screening decision would be needed for the land to be returned to arable use. The intention for the Scheme, and what has been assessed in the Environmental Statement, is that as part of decommissioning, the land will be restored such that when it is returned to the landowners, they may immediately use it for agricultural.

ExQ	Respondent	Question	Applicant's Response
		Regulations do not have an equivalent exemption for DCO EIA development. Can the applicant expand on their brief justification for including this legislative modification in Article 6, to explain what implications arise if new sub-part (4) of Article 6 is not included in the dDCO? Can the applicant also advise whether it has discussed, or whether it is necessary to discuss, the insertion of sub-part (4) into Article 6 with Natural England?	The Environmental Impact Assessment (Agriculture) (England) (No. 2) Regulations 2006 envisage this scenario in the context of projects, authorised by the Town and Country Planning Act 1990, which meet the criteria for EIA development. The exemption applies to projects for which planning permission is granted such that the environmental impact assessment will apply to the return of the land to agriculture, and no separate screening decision is required. This reflects that the EIA for such projects will, where a project is to be decommissioned, cover the whole life of that project including any requirements for that decommissioning. The Regulations do not provide an equivalent exemption for EIA development that is authorised by the Planning Act 2008. However, this appears to be an omission (noting that the Regulations commenced prior to the Planning Act 2008) rather than a genuine distinction in the law, given the justification for EIA TCPA development being exempt applies equally to EIA Planning Act development. If the new drafting were not included in the DCO when made, the position would be as Natural

ExQ	Respondent	Question	Applicant's Response
			England set out. Whilst the project would be decommissioned and the land restored as authorised by the DCO, the land could not actually be used for agricultural purposes until a further screening decision had been carried out. Whilst that screening decision would likely find no reason why the land could not be returned to arable use, given it would have been fully restored for such purposes already, this would nevertheless constitute an additional burden for landowners to discharge before the land could be used for farming, and leaves uncertainty over whether the land could be so used. In order to give full effect to the Environmental Statement assumptions and requirements around decommissioning, the TCPA exemption for EIA development needs to also be extended to EIA development under the Planning Act 2008. In light of the above, the Applicant does not consider this approach to be controversial; however it will confirm the approach with Natural England as part of the discussions on the Statement of Common Ground.

ExQ	Respondent	Question	Applicant's Response
DCO2.6	The Applicant	**Article 7 - Defence to proceedings in respect of statutory nuisance** ExQ1 DCO1.11 queried whether Article 7 was justified given the statement of the applicant in the Explanatory Memorandum that there is no statutory nuisance expected as a result of the authorised development. The applicant's response [REP3-128] stated that Section 158 of the Planning Act 2008 confers statutory authority for the carrying out of development or doing anything else authorised by the Order and that this acts as a defence in any criminal or civil proceedings for nuisance in the absence of any contrary provision in the Order. It added that *nuisance from noise is not anticipated from the Scheme, and is not required to be managed through the Requirements. It is therefore very unlikely that the Applicant would need to rely upon the statutory defence conferred by section 158 of the Planning Act.* The ExA seeks to understand from the applicant if there are any contradictions between Article 7 and the monitoring and mitigation measures included in Table 8 of the oOEMP [REP4-051], which states that *annual noise monitoring will be undertaken and the undertaker and relevant planning authority will then liaise in respect of any further maintenance or*	The Applicant is confident that there are no contradictions between Article 7 and the provisions relating to noise found in the **Outline OEMP [REP4-051].** Article 7 provides a defence to noise-based nuisance where a) the Applicant has complied with a notice under section 60 or a consent under section 61 of the Control of Pollution Act 1974; b) the noise is a consequence is the construction, maintenance, use or decommissioning of the authorised development and cannot be reasonably avoided. The provisions of the **Outline OEMP [REP4-051]** constitute the mechanism for ensuring that noise levels are monitored and, if they exceed the levels in the ES, are reduced. Article 7 does not remove or reduce the obligation to comply with the measures in the OEMP. A person experiencing a noise nuisance from the Scheme would therefore be able to make a claim in nuisance, and the monitoring and any corrective measures required through the **Outline OEMP [REP4-051]** would provide the evidence base for how that noise could be

ExQ	Respondent	Question	Applicant's Response
		mitigation required to reduce levels at receptors back to those presented in the ES. Further, in the case of third-party complaints about noise, correction actions will be taken by the Environment Manager and recorded as outlined in Section 6.2.	"reasonably avoided", i.e. through the proper application of the corrective measures. Notwithstanding the above, the Applicant remains confident that the Scheme will not result in noise levels that will require control through the Requirements or that would constitute a nuisance; however, should such occur, article 7 and the monitoring provisions in the **Outline OEMP [REP4-051]** would operate in tandem to enable such a claim to be made and evidenced.
DCO2.7	The Applicant Wiltshire Council	**Article 16 – Traffic regulation measures Q1** Article 16 was discussed at ISH4 in relation to whether the notice timeframes in 16(5) for carrying out any of the traffic regulation measures permitted by this Article are sufficient. As part of that discussion the applicant emphasised that the traffic regulation measures sought (such as signs or signals) have to be approved as part of the CTMP, which would occur before the notification required by 16(5). The ExA has reviewed the oCTMP and notes that paragraph 2.4.1 states: *Details of the form and proposed locations of any signs or signals to be placed on a public highway will be submitted to Wiltshire Council and South*	Paragraph 2.4.1 confirms that the details of the form and proposed locations of signs or signals would be included in the detailed CTMP . The locations would therefore be approved as part of the approval of the CTMP. This includes temporary signage as envisaged in more detail by paragraph 4.5.1. Additionally, section 6.5 of the **Outline CTMP [REP4-057]** confirms that "*the signage strategy will be agreed with the local highway authorities through the Final CTMPs*". In the event the details were submitted separately (for example, in the event that the information was not available when the detailed CTMP was approved), the

ExQ	Respondent	Question	Applicant's Response
		Gloucestershire Council in advance of being placed (either as part of the CTMP or separately). In addition, paragraph 4.5.1 states: *Temporary road signage will be implemented along the designated routes to inform background traffic of the ongoing construction works and to direct construction traffic to and from the Site. The signs will be located at key points along the route, including junctions.* Neither of these paragraphs require the details of signs or signals to be approved as part of the CTMP. Furthermore, the traffic regulation measures included in Article 16 are much broader and include for example, restricting the stopping, waiting, loading or unloading of vehicles on any road, or the use of any road by vehicular or non-vehicular traffic. None of these measures are seemingly captured as matters in the oCTMP that require advance approval by the traffic authority before the powers in Article 16 can be used. The ExA notes that paragraph (4) does require the applicant to obtain the written consent of the traffic authority, which suggests that the actual detail of the traffic regulation measures sought will be through the consent process outlined in Article 47 and not through	detailed CTMP would need to set out what that approval process would entail. If the process did not provide for approval of the signage, the relevant planning authority would be at liberty to refuse to approve the detailed CTMP until the process was updated. In respect of the other measures that are included in Article 16, the Applicant refers to section 6 of the **Outline CTMP [REP4-057]** generally. This section provides, in general terms, the approach to traffic management and improvements to the highway network. The **Outline CTMP [REP4-057]** sets out broad principles that will be applied when drafting the detailed CTMP. The traffic management measures to be implemented form part of the suite of measures to be refined and identified in detail within the detailed CTMP. The approach of the **Outline CTMP [REP4-057]** clearly including within its scope the traffic management measures has the effect of controlling the measures that may be imposed through Article 16. A traffic management measure that is contrary to the approved CTMP would be a breach of Requirement 15(4) that the works must be carried out in accordance

ExQ	Respondent	Question	Applicant's Response
		the CTMP approval process (and the Schedule 16 discharge provisions). This was touched upon in ISH4 and the applicant agreed that in theory it could apply for consent under Article 16 and the process outlined in Article 47 would apply, although it added that it could still not carry out the works because they would have to be approved under the CTMP. As highlighted above, the latter does not seem to be the case. In which case, a consent sought under Article 16 would only give the traffic authority 6 weeks to approve the detail (pursuant to Article 47) or else it would receive deemed consent. Thus, in order to pin this down and remove any potential confusion, the ExA would welcome a response from the applicant and Wiltshire Council on whether paragraph (4) should say something along the lines of: *(4) Before exercising the power conferred by paragraph (1) the undertaker must—* *(a) consult with the chief officer of police in whose area the road is situated; and*	with the approved CTMP, and therefore an offence. Accordingly, it is not considered necessary to amend the drafting, and it is noted that whilst the **Outline CTMP [REP4-057]** includes provision for a bespoke approach to be taken to approving signage etc to be agreed, the proposed amendment would make this impossible. The proposed amendment would require even small modifications to the traffic management measures in the CTMP to need a formal amendment to be made to the approved CTMP, even in circumstances where the change was requested by the Council. It is therefore considered desirable to retain the flexibility for the Applicant and the Council to agree the ways of working around traffic management measures within the detailed CTMP.

ExQ	Respondent	Question	Applicant's Response
		(b) obtain the written consent of the traffic authority ***as part of the construction traffic management plan in Schedule 2, Requirement 15****.*	
DCO2.8	Wiltshire Council	**Article 16 – Traffic regulation measures Q2** In its post hearing submission [REP4-092] the Council maintains that the notice timeframes contained in Article 16(5) do not enable the national standard practice to be adhered to. It adds that the Council is prepared to reduce the timeframe in sub-paragraph (5)(a) from 12 weeks to 8 weeks but would not be able to comply with 4 weeks and still fulfil its statutory duties. Can the Council please explain, signposting the ExA to the relevant piece of legislation, which statutory provision would be breached if the notice period were to remain at 4 weeks?	Question not directed to the Applicant.
DCO2.9	The Applicant	**Article 16 – Traffic regulation measures Q3** At ISH4 Stop Lime Down suggested the insertion of an addition of a new sub-paragraph (c) to paragraph (5), which would require the applicant to display a site notice containing the traffic regulation measures on the roads affected as part of the notice period process.	The Applicant notes that, in response to question DCO1.20, Wiltshire Council confirmed that "On-site publication for temporary Traffic Regulation Orders (TROs) are not prescribed, so the council does not do on-site notices." (see **Wiltshire Council Response**

ExQ	Respondent	Question	Applicant's Response
		Stop Lime Down referred to The Springwell Solar Farm Order 2026, and transposing that provision into the Lime Down dDCO it would be drafted as follows: *(5) The undertaker must not exercise the powers in paragraphs (1) or (2) unless it has—* *(a) given not less than 4 weeks' notice in writing of its intention so to do to the chief officer of police and to the traffic authority in whose area the road is situated;* *(b) not less than 7 days before the provision is to take effect published the undertaker's intention to make the provision in one or more newspaper circulating in the area in which any road to which the provision relates is situated; and* ***(c) displayed a site notice containing the same information at each end of the length of road affected.*** The applicant is requested to apply the insertion of sub-paragraph (c) in its next revision of the dDCO or explain why it is not necessary. Stop Lime Down also requested whether a greater level of detail should be inserted into the oCTMP (if indeed the traffic regulation measures are approved as	**to ExA's First Written Questions [REP3-142]).** In light of it not being standard practice to issue site notices for TROs, the Applicant does not consider that there is any reason for site notices to be issued for traffic management measures made pursuant to Article 16. It is also mindful that a site notice would be of limited benefit, as traffic management measures control highway traffic and it would be necessary for vehicles to find a safe location to stop in order to read any site notices that were put up. It is also noted that the measures themselves will be implemented through signage that complies with Chapter 8 of the Traffic Signs Manual (where applicable) (see paragraph 4.5.2 of the outline CTMP). This approach ensures that motorists are aware of the traffic management at the time it applies in the appropriate manner. A prior site notice, not readily understood by a travelling highway user, would not provide any benefit.

ExQ	Respondent	Question	Applicant's Response
		part of the CTMP, discussed in ExQ2 DCO2.7) around whether traffic regulation approvals should identify the duration of the measures being approved so as to avoid traffic disruptions for any longer than necessary. The applicant committed to exploring possible drafting on that matter, but nothing was submitted at deadline 4. The ExA requests a response on this matter at deadline 5.	Accordingly, the Applicant has not amended the draft Order to require site notices. Please refer to the Applicant's response to ExQ2 DCO2.7 in respect of how the traffic management measures will be approved as part of the detailed CTMP. In respect of the duration of traffic management measures, Article 16 authorises the making of such measures only for the purposes of the construction, maintenance and decommissioning of the authorised development. The duration of such measures is automatically restricted by the connected purpose – that is, once a measure associated with safe access and egress of construction traffic it is no longer necessary for the purposes of constructing the Scheme, the measure would be removed as it would no longer be authorised by the Order. Accordingly it is not considered necessary to make further provision as to the duration of traffic management measures, noting also that any fixed duration for a measure would place an additional administrative burden on both the

ExQ	Respondent	Question	Applicant's Response
			Applicant and the Council to extend the measure in the event of construction delays.
DCO2.10	The Applicant	**Article 40 – Felling or lopping of trees and removal of hedgerows Q1** Wiltshire Council in its post hearing submission [REP4-092] (pages 59 to 61) continues to express concern about the scope of Article 40 and Schedule 12, as well as omissions in Schedule 12 in relation to measures in the Habitats Regulations Assessment (HRA). The ExA requires the applicant to review this part of the Council's submission and provide a full response and where necessary make amendments to the dDCO (with corresponding update to the Schedule of Changes to the Draft Development Consent Order).	Wiltshire Council's submission queries why it is necessary to list every hedgerow within the Order Limits within Schedule 12 of the **draft DCO [REP4-004]** if hedgerow removal is to be controlled by the **Outline Ecological Protection and Mitigation Strategy** (EPMS) **[REP4-055]**. The Applicant notes that the Council considers the approach to be overly broad, and asks why it could not be refined so that Schedule 12 provides a minimum and maximum extent of hedgerow removal. The Council also notes that a restriction on hedgerow removal in the Bath and Bradford-on-Avon Bat SAC consultation zone is not reflected within the **draft DCO [REP4-004]**. The Council queried the relationship between the powers in the draft DCO and the EPMS and has concerns around the certainty that article 40(4) will be adhered to.

ExQ	Respondent	Question	Applicant's Response
			The Applicant remains confident in its drafting of article 40 and notes that it is consistent with other made solar DCOs. Schedule 12 lists every hedgerow within the Order Limits, and the length of each hedgerow within the Order Limits. It is necessary to list every hedgerow in Schedule 12 as it is not yet known precisely where any hedgerow removal works will take place. Article 40(4) restricts the extent of the hedgerow that may be removed by reference to the EPMS that will be approved under Requirement 8. Article 3(1) states that the authorised development is granted development consent subject to the requirements in Schedule 2. Requirement 8 provides that no part of the authorised development may commence until the EPMS has been approved. The EPMS must be substantially in accordance with the outline EPMS. The EPMS must then be implemented as approved. The **Outline EPMS [REP4-055]** contains principles that will apply to the removal of

ExQ	Respondent	Question	Applicant's Response
			hedgerows. In particular, paragraph 3.4.3 secures that where hedgerows are within the Wiltshire Impact Zones for Bat Species, the gaps in hedgerows "*will be narrowed to a maximum 10 m width*". An updated indicative plan has been provided as Annex A of the **Outline EPMS [REP4-055]** which includes the minimum and maximum extents of the hedgerow removal. However, the exact location and extent of any hedgerow removal will only be known once the detailed design of the Scheme has been completed. The detailed EPMS must be '*substantially in accordance with*' the **Outline EPMS [REP4-055]**. This ensures there is sufficient flexibility for the location and extent of hedgerow removals to reflect the detailed design of the Scheme; whilst the principles to be applied when identifying hedgerow removals are secured. If the extents of removals were listed in Schedule 12, in the event the detailed design of the Scheme identified that a removal is required in a different location or to a different extent, even where this would be in full compliance with the principles in the outline EPMS and not result

ExQ	Respondent	Question	Applicant's Response
			in any materially new or different environmental effects, it would be necessary to amend the DCO in order for the hedgerow removals to be authorised. It is noted that the detailed EPMS must be approved by the relevant planning authority, i.e. Wiltshire Council. The extent of hedgerow removals will be set out within the EPMS submitted for approval. In the event hedgerow removal was then carried out other than in accordance with the approved EPMS, this would be a breach of both Requirement 8 and article 40(4) and enforcement action could be taken. The Applicant is therefore confident that there is continuity across the relevant documents; the perceived differences in the draft DCO reflect the need to retain flexibility for the detailed design of the Scheme to be carried out within the assessed Rochdale Envelope.
DCO2.11	Stop Lime Down The Applicant	**Article 40 – Felling or lopping of trees and removal of hedgerows Q2** Stop Lime Down has suggested [REP3-173 and REP4-132] that the word 'only' should be	The addition of the word '*only*' is unnecessary and does not provide any greater clarity or restraint on the powers. As currently drafted, the power in paragraph (4) applies to the hedgerows specified in Parts 1 and 2 of Schedule 2. If a

ExQ	Respondent	Question	Applicant's Response
	Wiltshire Council	inserted after the word 'remove' in Article 40(4), such that it would say: *(4) The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove only the hedgerows specified in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) to the extent set out in the ecological protection and mitigation strategy approved pursuant to requirement 8 in Schedule 2 (requirements).* Stop Lime Down: 1. Stop Lime Down are requested to explain the necessity for this insertion. The Applicant and Wiltshire Council: 2. The applicant and Wiltshire Council are invited to comment on the implications (if any) of this suggested insertion.	hedgerow is not listed, the power does not apply to it.
DCO2.12	Wiltshire Council	**Article 41 – Trees subject to tree preservation orders**	Question not directed to the Applicant.

ExQ	Respondent	Question	Applicant's Response
		Further to the discussion about this Article at ISH4, the applicant has included new notice provisions in paragraph (4) as follows: *(4) Notice in writing of the proposed activities authorised by paragraph (1)(b) must be given to the relevant planning authority—* *(a) in the case of activities urgently necessary to remove an immediate risk of serious harm, as soon as practicable after the activities become necessary; and* *(b) in any other case at least five working days prior to the date on which the activities are to be commenced.* The Council is asked to advise if a five working day notice period in sub-paragraph (b) is reasonable. If not, explain why not and provide justification for any longer notice period sought.	
DCO2.13	The Applicant	**Article 47 – Procedure in relation to certain approvals etc.** The ExA notes that Article 47(3) seeks only to allow the consenting authority a six-week period to determine a consent required application or else the application receives deemed consent. This was briefly	Article 47 provides a default timescale for consents to be provided where alternative provision is not made. This timescale does not apply in relation to applications for the discharge of Requirements (for which 10 weeks are provided); consents required under the protective provisions (which vary); any dispute

ExQ	Respondent	Question	Applicant's Response
		discussed at ISH4 in relation to Article 10 (Power to alter layout, etc., of streets) but it has wider application to other Articles. The ExA expressed concern over the six-week period, particularly in light of local authority resourcing constraints, but notes that the timeframe has not been altered in Revision 4 of the dDCO. The ExA notes that the recently made Orders for The Springwell Solar Farm 2026 and The One Earth Solar Farm 2026 contain a similar article yet they include a longer consenting period of 10 weeks and 13 weeks respectively. The applicant is therefore asked to justify why a six-week consenting period is more appropriate for the Lime Down Solar Project.	under article 19(6); or where an alternative timescale has been agreed. The purpose of article 47 is to provide certainty where a consent is required by the Order, but the request is not responded to. It is noted that article 47(4) requires the Applicant to highlight the timescale and the deemed approval process when making the application for consent and the consenting body is able to refuse consent. In practice, the majority of consents for which the Wiltshire Council is the consenting body will not be subject to article 47, with the majority being subject to Schedule 16 or the protective provisions. The timescale of six weeks is considered appropriate to balance the urgent need for the project with providing consenting bodies with a reasonable timeframe to review requests, noting always that a consenting party may request further time to consider such an application. It is also noted that Appendix 1 to the Planning Inspectorate's *Advice Note Fifteen: drafting Development Consent Orders* provides standard drafting for applications for the discharge of requirements to be determined of

ExQ	Respondent	Question	Applicant's Response
			42 days (six weeks); this is considered appropriate given the importance of nationally significant infrastructure projects, notwithstanding that resourcing is a common concern amongst local planning authorities. The Applicant considers that a period of ten weeks is appropriate for the planning authority to consider applications to discharge the Requirements. It considers that the period of six weeks remains appropriate for other applications for which an alternative timescale is not provided in order to provide certainty that the Scheme can be implemented in a timely manner.
DCO2.14	The Applicant	**Article 50 – Maintenance of drainage works** The ExA has been unable to find any other example of Article 50 being included in any other made solar DCO. The ExA seeks to understand the necessity for including this Article in the dDCO, for while the Explanatory Memorandum notes that an identical article has been included in three transport DCOs, that is not an explanation for its necessity in the Lime Down Solar Project Order.	Article 50 is included in the **draft DCO [REP4-004]** due to the presence of award drains in Wiltshire. An award drain is an ordinary watercourse or drainage ditch that was historically assigned or awarded under an Enclosure Act or drainage award report to a local authority for maintenance and upkeep. The purpose of this article is to clarify that responsibility for maintenance of such award drains is not affected by the provisions of the

ExQ	Respondent	Question	Applicant's Response
		On the basis that there is no precedent in other made solar Orders or indeed evidence to demonstrate that its purpose was properly examined, the applicant needs to fully justify why this Article, which appears to have only been used in transport DCOs, is specifically required and should remain in the Lime Down Solar Project dDCO.	Order unless otherwise agreed with the person responsible. This article can be found in numerous transport and energy DCOs where award drains are (or may be) present, including most recently: • The A46 Coventry Junctions (Walsgrave) Development Consent Order 2026 (article 5); • The A122 (Lower Thames Crossing) Development Consent Order 2025 (article 5); • The London Luton Airport Expansion Development Consent Order 2025 (article 5); • The Viking CCS Carbon Dioxide Pipeline Order 2025 (article 19); • The M5 Junction 10 Development Consent Order 2025 (article 4).
DCO2.15	The Applicant	**Multiple Requirements – National Highways** National Highways [REP4-098] has reiterated its concern that it is not named a consultee in Requirement 3, whilst also maintaining that it must be	National Highways is the statutory undertaker responsible for the strategic road network – a series of motorways and major A-roads that are the most heavily used part of the national

ExQ	Respondent	Question	Applicant's Response
		added as a consultee to Requirements 5, 7, 8, 10, 11, 13, 14, 15, 16 and 20 to protect its position. The ExA seeks to understand from the applicant what issues would arise from acquiescing to National Highways' request to be directly named in these Requirements.	highway network. National Highways operates under licence, issued by the Department for Transport. The core function of National Highways, as set out in the licence, is the operation and management of the strategic road network. The Scheme is a nationally significant infrastructure project with only limited interactions with the strategic road network. The interactions with the strategic road network are limited to the use of the SRN by construction traffic and the crossing of the SRN by the cable route corridor. Proportionate consultation and oversight for these aspects are provided for by the DCO. As a relevant highway authority, National Highways will be consulted under Requirement 15 (construction traffic management plan). The cable crossing is subject to the protective provisions for National Highways included in Part 5 of Schedule 15 to the **draft DCO [REP4-004]**. As relevant highway authority, National Highways will also be consulted in respect of decommissioning under Requirement 20.

ExQ	Respondent	Question	Applicant's Response
			The **Outline Construction Environmental Management Plan (CEMP) [REP4-049]** makes further targeted provision for National Highways to be consulted on fencing, drainage, and dust creation, as well as any changes or amendments to an approved CEMP that have effect within 10 metres (or otherwise in the vicinity of) the SRN. As a result of ongoing discussions with National Highways, the Applicant has also amended the **Outline Operational Environmental Management Plan [EN010168/APP/7.13]** (Revision 6) and the **Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]** (Revision 5) submitted at Deadline 5 to include an obligation to consult with National Highways where activities are proposed within close proximity or adjacent to the SRN or that could have an impact on the SRN. The proportionate approach set out above ensures that National Highways is fully consulted on all matters under the Requirements that could impact the SRN, and

ExQ	Respondent	Question	Applicant's Response
			the level of consultation is therefore consistent with National Highways' remit under its licence.
DCO2.16	The Applicant	**Requirement 11 - Surface and foul water drainage** The Lead Local Flood Authority (LLFA) is a mandatory consultee in the approval of surface water drainage strategies for major development under the Town and County Planning Act 2015. Therefore, the ExA disagrees with the applicant's position in its rebuttal to Wiltshire Council's response to EXQ1 FHW1.20 [REP4-081] and requests that they are added as consultees or provide a robust response, supported by caselaw if needed. In addition, as the development would not lead to foul water discharge into the sewer system, should Requirement 11 be named 'Surface water drainage' only? If the answer is no, please provide reasons and add reference to the relevant foul water consultee in the Requirement (presumably Wessex Water).	The Applicant notes this comment. It has added the LLFA as a consultee for Requirement 11. The Applicant also does not consider it appropriate to rename this Requirement. No foul water drainage to public sewers is anticipated, noting the general absence of public sewers within the Scheme area. However, to the extent on-site toilet facilities are provided, for example as part of a substation control room, the plan would need to include the provisions being made for foul drainage. It is noted that the Environment Agency is the relevant consultee around foul drainage, with the sewerage undertaker only engaged where a connection to their assets is proposed. The **draft DCO [REP4-004]** does not provide a power to connect and discharge into foul sewers. Accordingly, if a connection to a foul sewer were to be provided for the Scheme, it would need to be made under the ordinary connection process in section 102 of the Water

ExQ	Respondent	Question	Applicant's Response
			Industry Act 1991, directly engaging the relevant sewerage undertaker. No changes are considered necessary to this Requirement in relation to foul drainage or the listed consultees.
DCO2.17	The Applicant	**Requirement 20 - Decommissioning and restoration Q1** Notwithstanding Requirement 20(7) requiring the undertaker to notify the relevant planning authority within 28 days of any part of the authorised development permanently ceasing to be in commercial use, there is no legally enforceable requirement for that part (or parts) to be decommissioned and the land restored once it ceases to be used for the purposes of electricity generation for commercial use. Rather, Requirement 20(1)(a) as currently drafted, links decommissioning to a 60-year time period after the initial date of final commissioning, rather than the point at which any relevant part ceases to be used for electricity generation for commercial use (which may be much earlier than 60 years). Please provide alternative drafting that would ensure that there is a legally enforceable requirement for the proposed development,	The *"date of decommissioning*" is defined in article 2(1) as the "*date notified under requirement 20 that the commercial use of that part of the authorised development has permanently ceased*". "*Commercial use*" is also defined in article 2(1) as *"the export of electricity from any part, and the import of electricity to any part, by the authorised development on a commercial basis, following the date of final commissioning of any part of the authorised development*". The date on which a part of the authorised development ceases to be in commercial use is therefore the date of decommissioning. In this way, decommissioning is properly tied to the point at which commercial use ceases, with the 60-year maximum timescale for

ExQ	Respondent	Question	Applicant's Response
		or relevant part of it, to be decommissioned and the land restored following all or any part of the Order land ceasing to be used for the purposes of electricity generation for commercial use at any time, or explain why this is not reasonable/ necessary. For the avoidance of doubt, the ExA is seeking to avoid a situation where an option agreement on one part of the site expires after 40 years yet the infrastructure remains non-functional on the land for a further 20 years before decommissioning commences.	decommissioning acting only as a 'longstop' date where commercial use is ongoing. Requirement 20(3) requires the Applicant to submit the decommissioning plan for approval 10 weeks prior to the date of decommissioning. Once approved, the Applicant must implement the decommissioning plan in accordance with the approved timetable (Requirement 20(4)). Therefore, the Applicant considers that there would be a breach of Requirement 20(3) and (4) in the event that infrastructure on any part of the Site that is not in commercial use remains on the land without being decommissioned.
DCO2.18	The Applicant	**Requirement 20 - Decommissioning and restoration Q2** Further to ExQ2 DCO2.17, explain why there is no provision within the dDCO requirements for abatement of works that may become abandoned or decayed before the 60-year decommissioning time period is reached? Provide justification for why the following requirement (or similar) should not be included within the dDCO:	Requirement 20 requires decommissioning, connected to the date of decommissioning. Sub-paragraph (1) requires that the date of decommissioning is not later than 60 years after the earliest date of final commissioning. At least 12 months before the date of decommissioning (that is, at least 12 months before commercial use is ceased being 59 years from the date of final commissioning or earlier), the Applicant must notify the planning authority that it intends to decommission (sub-paragraph

ExQ	Respondent	Question	Applicant's Response
		Where the scheduled works or any part of them are abandoned or allowed to fall into decay, the Secretary of State may, following consultation with the undertaker, issue a written notice requiring the undertaker at its own expense either to repair, make safe and restore one or any of the scheduled works or any relevant part of them, or to remove them or any relevant part of them, restore the site to a safe and proper condition, to such an extent and within such limits as may be specified in the notice.	(2)). The decommissioning plan must be submitted for approval at least 10 weeks before the intended date of decommissioning (sub-paragraph (3)). The decommissioning plan must include a timetable for its implementation (sub-paragraph (4)). The plan must then be approved (sub-paragraph (5)) and implemented as approved (sub-paragraph (6)). In light of the definitions of "*date of decommissioning*" and "*commercial use*", the decommissioning plan, including the timetable for when the decommissioning will take place, will be submitted to the planning authority for approval whilst the relevant part of the authorised development continues to generate electricity on a commercial basis. Permitting the development to fall out of use and into a state of disrepair would be a breach of Requirement 20 as the commercial use of that part of the authorised development would have ceased without a plan for decommissioning. In the event that the commercial use of all or part of the authorised development ceased unexpectedly, the Applicant would need to agree an alternative timescale for approving the decommissioning

ExQ	Respondent	Question	Applicant's Response
			plan with the relevant planning authority or seek to amend the DCO to avoid a breach. This approach ensures that a plan for decommissioning is in place at, or shortly after, the date on which commercial use ceases. Once approved, the plan must be implemented. Any failure to decommission in accordance with the plan (including timetable) would be a breach of the Requirement and enforcement action could be taken by the planning authority. Additionally, maintenance of the Scheme is provided for by the **Outline OEMP [REP4-051]**, with a focus on those elements that provide mitigation of impacts. Compliance with the detailed OEMP secured by Requirement 14. In the event the Applicant were to cease maintaining the Scheme, whilst commercial use continued, it would be in breach of Requirement 14. The planning authority could then take enforcement action to require the breach is rectified, i.e. that maintenance works are carried out. In this way, all parties can be confident that the Scheme will not be permitted to fall into a state

ExQ	Respondent	Question	Applicant's Response
			of disrepair and, should this nevertheless happen, there is an enforcement mechanism available under the Planning Act 2008 to deal with this (see the Applicant's response to Action Point 7 in the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087]**). It is therefore not necessary to make provision for the Secretary of State to issue a notice of enforcement as this step is already available to the planning authority.
DCO2.19	The Applicant	**Requirement 20 - Decommissioning and restoration Q3** Wiltshire Council [REP4-092] suggests that Requirement 20 should include the requirement for a decommissioning phasing timetable and plan to be submitted to and approved by the planning authority, rather than just submitted to it. This would necessitate a revision to paragraphs (2), (3) and/ or (4). The Council also suggests that a new paragraph should be included in the Requirement indicating that the decommissioning report and certificate of completion should	The Applicant notes that paragraph (4) of Requirement 20 requires that the "*decommissioning plan must be substantially in accordance with the outline decommissioning strategy and must include a timetable for its implementation*" (emphasis added). Paragraph (3) of Requirement 20 Also requires that "…*the undertaker must submit to the relevant planning authority for that part a decommissioning plan for approval*" (emphasis added).

ExQ	Respondent	Question	Applicant's Response
		be submitted to the local planning authority for approval. The ExA considers that there is merit in these suggestions and therefore requests the applicant's consideration of them, and a justification if it does not wish to take the insertions forward.	The Applicant is therefore content that the decommissioning plan must be submitted for approval, and that this plan must include the timetable for how the decommissioning is to be carried out. It is not considered necessary to make provision in the Requirement for a certificate of completion to be submitted for approval. The decommissioning plan must be implemented as approved meaning if there was any failure to decommission the authorised development in accordance with the timetable set out, the planning authority could commence enforcement activity. The **Outline Decommissioning Strategy [REP3-096]** provides for monitoring and reporting, with an Environment Manager acting as day-to-day contact with the relevant planning authority (paragraph 6.1.2), and arranging regular formal inspections and a final review once decommissioning works are complete (paragraph 6.1.3). A report will be submitted to the planning authority quarterly and following completion of deviation (paragraph 6.2.3). The Applicant is

ExQ	Respondent	Question	Applicant's Response
			therefore confident that a process akin to the certificate of completion is already secured within the outline Decommissioning Strategy, and that the reporting and monitoring proposed by the Applicant exceeds that suggested by Wiltshire Council.
DCO2.20	The Applicant	**Proposed New Requirement – Register of Requirements** The ExA considers that it would be prudent for the applicant to maintain on a dedicated website a Register of Requirements to alert the general public, Parish Councils, community and/ or other stakeholders to the status of the control documents and to allow visibility of the approved documents. This is particularly important given the number of documents which require local planning authority approval, and given that several versions of the documents may be submitted to reflect a phased construction approach or a site by site approach. This type of requirement has precedent in The A122 (Lower Thames Crossing) Development Consent Order 2025 (Requirement 24). A link to National Highways' online register is here for example.	The Applicant has confirmed with Wiltshire Council that it will upload all applications for the discharge of Requirements to its website where they can be viewed by stakeholders. The Lower Thames Crossing example is noted, however for that project, the discharging authority is the Secretary of State (please see Part 2 of Schedule 2 to that Order). The requirement that National Highways maintain an online register of applications is needed as the Secretary of State does not maintain such a register directly. In respect of the Scheme, the discharging authority is the relevant planning authority, where the ordinary planning register is available and the appropriate location to share documents associated with applications to discharge the Requirements.

ExQ	Respondent	Question	Applicant's Response
		The ExA considers that this would assist the local planning authority in terms of managing public, Parish Council and consultee contact and/ or any complaints before and during the construction phase; it would also assist the Community Liaison Group (CLG) which would be established pursuant to Requirement 4 of the dDCO. The ExA requests the applicant's consideration of this suggested new Requirement and welcomes the submission of draft wording, or a justification if it does not wish to take the Requirement forward.	
DCO2.21	The Applicant	**Missing Documents** The applicant is asked to review Schedule 13 to ensure that it is accurate. The ExA notes that ES Chapter 8 – Landscape and Visual [REP3-025], ES Chapter 10 – Arboriculture [APP-062], ES Appendix 10-1 [APP-206] for example, are missing from the Schedule, but other documents may also be missing.	The Applicant notes this comment and has added **ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]** to Part 2 of Schedule 13 in the updated **draft DCO [REP4-004].** The Applicant has not included **ES Volume 1 Chapter 10 Arboriculture [APP-062]** and **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** as these documents have been not substituted. The Applicant has corrected the other omissions it has identified.

ExQ	Respondent	Question	Applicant's Response
DCO2.22	The Applicant	**Confidentiality Clause in Arbitration Rules** The applicant is required to justify the confidentiality clause included in Schedule 14 of the Arbitration Rules. The ExA notes that the drafting is notably different to that used in several recently made Orders, not least The One Earth Solar Farm Order 2026, The Springwell Solar Farm Order 2026, The Peartree Hill Solar Farm Order 2026 and The West Burton Solar Project Order 2025. The applicant should therefore explain why confidentiality is necessary for materials, documents, awards, expert reports and any matters relating to any future arbitration in this case, and what sets the Lime Down project apart from those other cases.	Paragraph 8 of Schedule 14 to the **draft DCO [REP4-004]** is taken from the Confidentiality provisions added by the Secretary of State when making the Heckington Fen Solar Park Order 2025 (see paragraph 7 of Schedule 12 to that Order). The Applicant recognises the requirement of the Secretary of State that arbitrations under DCOs should default to being held in public. The Applicant considers that the drafting in Schedule 14 is precedented, but has no objection to the use of the alternative confidentiality drafting included in the Orders listed. The Applicant has updated the draft DCO to utilise the drafting from these Orders.
DCO2.23	All Statutory Undertakers Wiltshire Council	**Status and Proposed Revisions** As per the examination timetable, all Statutory Undertakers and Wiltshire Council are requested to submit their proposed version of protective provisions that they wish to see included for their benefit in the dDCO but have not been agreed by the applicant. Please also set out why you are not content with the applicant's version in Schedule 15 of Revision 4 of	Question not directed to the Applicant.

ExQ	Respondent	Question	Applicant's Response
		the dDCO [REP4-004], and explain why the ExA and Secretary of State should prefer your suggested drafting.	
DCO2.24	The Applicant	**Protected Provisions for The Local Highway Authority** The ExA acknowledges the submission of draft protected provisions for the local highway authority from the applicant [REP4-004] and Wiltshire Council [REP4-092]. From a review of the drafts, the ExA notes for example (but not least) that the definition of "the bond sum" and "the commuted sum" are different between the two versions, while the "estimated costs of works" definition provided by the Council has not been included in the applicant's version. The ExA also notes that in the applicant's definition of "the bond sum", sub-paragraph (c) refers to National Highways, when it should refer to the local highway authority. The Applicant: The applicant is required to identify for the ExA all variances between the two versions and advise what discussions are taking place to resolve these variances. The ExA appreciates that prior to deadline 5	The Applicant has provided a tracked version of the draft protective provisions for the local highway authority. This shows as the 'base' document the version included within the **draft DCO (Rev 4) [REP4-004]**, with changes to the version submitted by Wiltshire Council in its **post-hearing submissions [REP4-092]**. The Applicant has provided this for information only and confirms that negotiations are continuing with Wiltshire Council Highways. The Applicant also notes the error in the definition of "the bond sum" and this will be corrected in the next update to the protective provisions. No revisions are required to the provisions of articles 8 to 16, Requirement 15 or the **Outline CTMP [REP4-057]**. Article 45 (protective provisions) gives effect to the provisions of Schedule 15. These operate in addition to the powers provided in the articles such that, where the

ExQ	Respondent	Question	Applicant's Response
		the drafting of the protected provisions for the local highway authority may evolve, such that a revised version of the provisions may be submitted into the examination, but it would nonetheless be helpful to the ExA for the variances from the Council's version to be clearly identified, explained and justified. The applicant is also asked to explain whether any revisions are required to the drafting of Articles 8 to 16, or Requirement 15 (or the oCTMP) in light of these protected provisions. The ExA is seeking to be absolutely clear on whether Article 47, Schedule 16 or the protected provisions take priority in the consent/ approval arrangements contained within Articles 8 to 16 and Requirement 15. Wiltshire Council: Wiltshire Council is also invited to make submissions if required.	protective provisions apply, the power can only be exercised if it is done in a manner that also complies with the protective provisions. The **Outline CTMP [REP4-057]** also does not need to be updated to make specific reference to the protective provisions. The detailed CTMP will be approved in consultation with the relevant highway authority. The detailed plans required under the protective provisions for Wiltshire Council as Highway Authority may be included within the detailed CTMP submitted for approval; however this would not remove the requirement for approval under the protective provisions (albeit the highway authority could confirm its approval for the purposes of the protective provisions in its response to consultation on the discharge of the CTMP requirement). In summary, the addition of protective provisions for the local highway authority adds an additional process to be followed before the DCO streets powers are exercised. Any exercise of articles 8 to 16 must also be carried out in a way that is compliant with the protective provisions to be lawful.

ExQ	Respondent	Question	Applicant's Response
			Approval under the protective provisions is separate from the discharge of the CTMP requirement. In practice, these are closely linked as the detailed CTMP will set out, for example, the traffic regulation measures to be implemented under article 16; whilst the detailed plans for those measures will need to be approved by the highway authority under the protective provisions. A coordinated approach will need to be adopted to ensure that the measures in the CTMP have been approved under the protective provisions at the relevant time.
DCO2.25	The Applicant National Grid Electricity Transmission Plc	**Protected Provisions for National Grid Electricity Transmission Plc (NGET)** In response to ISH4 Action Point 9 [REP4-087] the applicant provided a summary of negotiations with statutory undertakers on protected provisions. The ExA notes the applicant's update that it is liaising with NGET over protected provisions on another DCO application (Green Hill Solar Farm) and is looking to replicate the provisions to be agreed for that project. However, the examination for Green Hill Solar has closed and is in decision phase, so if negotiations on protected provisions for that scheme are still ongoing,	The Applicant sent NGET's solicitors draft protective provisions and a side agreement for Lime Down on 12 June 2026 and is awaiting a response. The Applicant remains confident that agreement will be reached prior to the close of the Examination.

ExQ	Respondent	Question	Applicant's Response
		the ExA assumes that those provisions were not agreed for that project before the close of that examination. The ExA is concerned that negotiations with NGET on provisions for Lime Down are paused because even if provisions for Green Hill Solar are agreed before the close of the Lime Down examination there still needs to be time to make bespoke changes for this project. Notwithstanding ExQ2 DCO2.23 above, the ExA would welcome an honest and realistic position from the applicant and NGET on the likelihood of agreeing protected provisions for Lime Down before the anticipated close of this examination on 21 October 2026, particularly in light of NGET's submissions at deadline 3 [REP3-148 and REP3-149], which stated that discussions on the protective provisions are at an early stage.	
DCO2.26	The Applicant	**Protected Provisions for the Environment Agency** The Environment Agency (EA) [REP4-097] (Ref EA-012) notes the applicant has made some amendments to its standard protective provisions regarding flood risk activity permits in the dDCO. The EA do not agree to the proposed amendments.	The Applicant has utilised the EA's standard form of protective provisions. Modifications have been made to the formatting in order to bring the protective provisions in line with statutory instrument drafting conventions.

ExQ	Respondent	Question	Applicant's Response
		The applicant is asked to explain why the standard protective provisions have not been used and why the ExA and the SoS should prefer your suggested drafting.	Use of the term "*limits of deviation*" in the Maintenance of Works paragraph has also been revised to read "*…which is situated within the Order limits…*" as the **draft DCO [REP4-004]** does not use limits of deviation. The Applicant has explained the reason for this change to the Environment Agency and is awaiting a response.
DCO2.27	The Applicant National Highways	**Protected Provisions for National Highways** In response to ISH4 Action Point 9 [REP4-087] the applicant provided a summary of negotiations with statutory undertakers on protected provisions. The ExA notes the applicant's statement that it is confident that protected provisions with National Highways will be agreed prior to the close of the examination. However, National Highways in its deadline 4 submission [REP4-098] states that *whilst National Highways is content in principle with the protected provisions and Side Agreement reflecting the position agreed at Green Hill, National Highways has made it clear to the Applicant that there are scheme specifics that need to be agreed before NH is in a position to formally agree the PP's.* *Following NH's in principal approval, progress with the*	National Highways requested an additional amendment to the protective provisions on 3 August 2026 together with some amendments to the outline management plans. The Applicant has responded and is awaiting final confirmation that the protective provisions and side agreement are now agreed. The Applicant remains confident that agreement will be reached prior to the close of the Examination.

ExQ	Respondent	Question	Applicant's Response
		Applicant on requirements has been minimal (ref NH-007). Notwithstanding ExQ2 DCO2.15 and DCO2.23 above, the ExA would welcome an honest and realistic position from the applicant and National Highways on the likelihood of agreeing protected provisions for Lime Down before the anticipated close of this examination on 21 October 2026, particularly noting the absence of any updates to the SoCG since deadline 2 [REP2-030].	
DCO2.28	The Applicant	**Fees Q1** Schedule 16(5) relates to fees associated with the discharge of the dDCO requirements. Can the applicant explain how it has arrived at the fees quoted in sub-paragraph (2)(a) to (c) and why there is no provision for increasing these fees in line with any uplifts in line with the Consumer Prices Index for example? The ExA is aware that the Government recently published its response to the Fees for Planning Applications Consultations, which includes consideration of local authorities being able to set their own fees locally to meet their actual costs. The ExA is therefore seeking to understand from the applicant	The fees identified in Schedule 16 are taken from Schedule 1 to the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. Specifically, the fee for the first application for the discharge of requirements in paragraph 5(2)(a) corresponds with item 11(2) in the scale of fees in Part 2 of the Schedule, relating to operations not coming within the other categories listed. The fee identified is £293 per 0.1 hectare subject to a maximum of £2,535.

ExQ	Respondent	Question	Applicant's Response
		how it has arrived at the fee sums included in Schedule 16(5)(2)(a) to (c) and whether this has involved any discussion and agreement with Wiltshire Council. Wiltshire Council is also invited to comment.	The fee in paragraph 5(2)(b) for subsequent applications for discharge of £578 corresponds with the fee in paragraph 4 of Schedule 1, being the fee payable where an applicant has previously applied for the approval under the same outline planning permission, a scenario that mirrors that envisaged by paragraph 5(2)(b). The fee in paragraph 5(2)(c) is a general administrative fee, in recognition that the applications made for approval as required by detailed management plans will be targeted and limited in scope. The fees are fixed, other than in relation to the discharge of the decommissioning requirement. Unlike for ordinary planning applications, as set out in the MHCLG Guidance on Infrastructure Planning (Fees) Regulations 2010 – cost recovery by the Planning Inspectorate and public authorities, the planning authority also has a statutory right to recover its costs in connection with the Application. As set out in paragraph 2.8 of that Guidance, relevant services are stated to include "*Services provided to the applicant, the Secretary of State or any*

ExQ	Respondent	Question	Applicant's Response
			other person (for example, the Local Planning Authority), after the decision is made by the Secretary of State or in relation to the implementation of the decision, such as the discharge of requirements". In the context whereby the planning authority has a statutory right to recover its costs, the fee for the discharge of Requirements becomes unnecessary as all costs associated with the discharge are recoverable in full. This notwithstanding, the Applicant considers it appropriate to retain a charging schedule within Schedule 16; however for clarity and simplicity, inflationary increases are not provided for as they are not necessary to enable the Council to recover its costs. The exception to this is in relation to the discharge of the decommissioning Requirement which will take place up to 60 years after the date of final commissioning, where the legal framework around cost recovery may differ and inflationary increases may be an important and relevant part of the planning authority's cost recovery.

ExQ	Respondent	Question	Applicant's Response
			The Applicant notes that the Applicant and Wiltshire Council are also in discussions regarding a post consent planning performance agreement to cover any costs incurred by Wiltshire Council prior to the formal application for discharge of the requirement.
DCO2.29	The Applicant	**Fees Q2** Schedule 16 paragraph (5)(2)(d) was inserted into Revision 3 of the dDCO [REP3-005], however the ExA notes that no explanation for this insertion was provided in an updated Explanatory Memorandum. While it seems to explain how the fees have been set in sub-paragraph (2)(a) to (c), it appears to only to reference applicability to Requirement 20 (decommissioning and restoration). The ExA is confused as to why that is the case. The ExA requests that the applicant reviews paragraph 5(2)(d) and provides an explanation for its insertion and what it is seeking to achieve.	The Applicant notes this omission from the Explanatory Memorandum and will correct this in the next version of the document to be submitted into Examination.

2.8 Ecology and Biodiversity

Table 2-8 Ecology and Biodiversity

ExQ	Respondent	Question	Applicant's Response
EB2.1	Natural England The Applicant	**Livestock and 400kV Cable Depth** <u>Natural England:</u> 1. The ExA asks that Natural England provide advice on the minimum depth a 400kV cable should be buried across farmland, whether used for livestock grazing or arable activities, to avoid adverse effects on agricultural practice. <u>The Applicant:</u> 2. Confirm the absolute minimum depth the 400kV cable will be buried below ground level throughout the Order limits and explain what efforts will be made to avoid the effects of electromagnetic fields on agricultural practice.	As set out in Table 3-1 of **ES Volume 1, Chapter 3: The Scheme [APP-055]** and secured within Table 2-3 of the **Design Principles and Parameters [REP4-043]** the Applicant confirms that the minimum depth the 400kV cable will be buried below ground level is 1.2m. The selection of a 1.2m minimum depth for open cut trenching is specifically intended to ensure that the infrastructure is installed beneath the typical agricultural soil profile and the root zone of common agricultural crops. This ensures that there is no physical interference with standard arable activities, such as ploughing, and mitigates risks such as drought stress to crops from cable heat, nor is there any risk of interaction between any agricultural practice and the cable infrastructure. Furthermore, the anticipated use of XLPE cabling for the 400kV circuit would minimise magnetic fields associated with the current in

ExQ	Respondent	Question	Applicant's Response
			addition to the burial depth up to 2m by optimising the close spacing of the three phases. This close grouping allows the magnetic fields produced by each current phase to partially cancel each other out. As a result, EMF exposure experienced by livestock at ground level would be substantially reduced compared with an equivalent overhead line arrangement for example. Regarding the effects of Electromagnetic Fields (EMF) on agricultural practice, the Applicant's assessments conclude that no significant adverse effects will occur and the use of a minimum 1.2m depth has informed the assessment, as set out in Section 20.6 of **ES Volume 1, Chapter 20 Other Environmental Matters [APP-072** The Applicant recognises that while 1.2 metres is the target minimum burial depth for the open cut method, there are rare instances that could force the cable to be installed at a shallower depth such as the presence of significant rock layers or other geological impediments which may physically prevent the excavation of a trench to the full minimum 1.2-metre depth. In

ExQ	Respondent	Question	Applicant's Response
			addition, the CRC crosses a variety of existing buried infrastructure, including other electrical cables, gas pipelines, and water mains. In instances where the Applicant must route the 400kV cable above existing apparatus to ensure its integrity or comply with safety clearances, a shallower burial depth may be required. These instances are being informed by ongoing discussions with the relevant stakeholders in negotiations of PP's. The primary response to encountering an obstacle affecting cable depth will be alleviated by micrositing the cable within the CRC. The spatial flexibility built into the DCO specifically allows the detailed design and engineering teams to find alternative paths where the required 1.2-metre depth can be maintained while avoiding sensitive features or shallow rock. Where micrositing is not possible, the Applicant is committed to using reasonable endeavours to install the cable at the greatest practicable depth. If a reduction in depth is necessary, the Applicant will engage with the affected landowner to ensure the cable

ExQ	Respondent	Question	Applicant's Response
			remains protected and that future agricultural activities, such as intrusive drainage works, can be safely coordinated.
EB2.2	The Applicant	**Existing Buildings** Section 6.3 of the outline Ecological Protection and Mitigation Strategy (oEMPS) [REP3-102] states that *in the event that construction works require trees or buildings to be impacted, altered or removed, these will be thoroughly inspected by a suitably qualified (and licensed, in the case of bats) ecologist in advance.* However, in response to ExQ EB1.15 [REP3-128], the applicant states that all existing buildings with the potential to support nesting birds and/or roosting bats are proposed to be retained. In light of the applicant's response to ExQ EB1.15, it is unclear how the buildings proposed for retention have been identified within the application documents and how their retention would be secured through the DCO given the flexibility provided in the oEMPS. The applicant is requested to clarify the approach to the retention of existing buildings with the potential to support nesting birds and/or roosting bats, and to identify these buildings in the oEMPS and any other relevant control or certification documents, as appropriate.	For clarity, Table 2 has been inserted into the **Outline Ecological Protection and Mitigation Strategy (EPMS) [REP4-055]** identifying all buildings within the Order Limits that have been identified as having bat roost potential and confirming that these buildings will be retained. These comprise all buildings within the Order Limits identified as having bat roost potential in **ES Volume 3, Appendix 9-3 Bat Survey Report [APP-200]**. The same buildings also provide nesting habitat for bird species that typically nest in buildings, including hirundine species and barn owl. The updated **Outline EPMS [REP4-055]** has been submitted at Deadline 5.

ExQ	Respondent	Question	Applicant's Response
EB2.3	The Environment Agency The Applicant	**Riparian Species** <u>The Environment Agency:</u> 1. The EA's deadline 4 submission [REP4-097] confirms that spot checks undertaken by the applicant were not done as per Chartered Institute of Ecologists and Environmental Managers (CIEEM) guidelines. If the applicant adopted the 10m watercourse buffer would this overcome the EA's concerns regarding the survey work. 2. If this approach would not address the EA's concerns, please provide any further comment regarding the potential adverse effects on riparian species that could be caused by the applicant's approach, considering the applicant's justification in [REP4-086]. <u>The Applicant:</u> 3. Given the concerns raised by the EA regarding the spot checks methodology, can you confirm that you would provide for a 10m watercourse buffer throughout the Order limits to reduce the potential effects. Please note that your response could impact your reply to ExQ EB2.13.	The Applicant considers that this question conflates two separate matters that were the subject of previous comments raised by the Environment Agency (EA), namely: • the methodology ("spot checks") adopted to assess riparian mammals at proposed watercourse crossing locations within the Cable Route Corridor; and • the extent of watercourse buffers applied to Solar PV infrastructure and fencing. These matters relate to different aspects of the Scheme and should not be considered interchangeable. With regard to the first point, the EA's previous comments regarding spot checks related specifically to the methodology adopted for water vole and otter surveys at proposed watercourse crossing locations. During a meeting between the Applicant and the EA on 28 July 2026, the approach to riparian mammal surveys and construction at cable route crossing locations was discussed.

ExQ	Respondent	Question	Applicant's Response
			The Applicant confirmed that higher sensitivity watercourse crossings are generally proposed to be installed using HDD, thereby avoiding direct impacts, and that following detailed design, further targeted surveys would be undertaken, with avoidance and micrositing prioritised and protected species licences obtained only where necessary. During the meeting, the EA advised that targeted surveys should be undertaken two months prior to the commencement of works. The Applicant agreed to this request and the **Outline EPMS [REP4-055]** has been updated at Deadline 5 to secure this commitment. It is the Applicant's understanding that this matter has now been resolved. With regard to the second point, the approach to watercourse buffers was also discussed during the meeting on 28 July 2026. The Applicant explained the rationale for applying a minimum 8 m buffer to ditches and a minimum 10 m buffer to rivers, streams and watercourses of higher ecological sensitivity

ExQ	Respondent	Question	Applicant's Response
			(for example, where evidence of water voles has been confirmed). The Applicant also clarified that these buffers relate to the location of fencing, rather than Solar PV panels. During the meeting, the EA confirmed that its preferred 10 m buffer is advisory rather than statutory and indicated that it was satisfied with the Applicant's proposed approach. The Applicant therefore considers that the matters relating to both riparian mammal survey methodology and watercourse buffer distances have been resolved with the EA and understands that this position will be reflected in the Statement of Common Ground to be submitted at Deadline 6.
EB2.4	The Applicant Natural England	**Great Crested Newts (GCN)** <u>The Applicant and Natural England:</u> 1. The ExA is in receipt of the District Level Licence Impact Assessment and Conservation Payment Certificate for the CRC [REP2 041]. However, the ExA are not clear on Natural England's position with respect to GCN in the solar PV sites despite the wording of the SoCG [REP4-063] 3.3.16 and that it is now 'Agreed'. The wording of	The Applicant notes the Examining Authority's request for clarification. During the Relevant Representations stage, Natural England requested further information regarding the approach to great crested newts (GCN) at the Solar PV Sites. At NE-071 (page 539 to 540) of the **Applicant's Response to Relevant Representations (Part 1) [PDA-009]**, the

ExQ	Respondent	Question	Applicant's Response
		this is unclear and both the applicant and Natural England are requested to provide a clear explanation of the current position. <u>Natural England:</u> 2. Please provide a response to the concerns raised by Wiltshire Council regarding GCN in their deadline 4 submission [REP4-091], reference EB1.7.	Applicant clarified that the Scheme has been designed to avoid impacts to GCN wherever practicable and highlighted the mitigation and precautionary measures secured through the **Outline EPMS [REP4-055]**. These measures include pre-construction checks, appropriate ecological supervision where required, the implementation of reasonable avoidance measures, and contingency procedures should GCN be encountered during construction. Following the Applicant's clarification, Natural England confirmed via email to the Applicant on 26 June 2026 that previous comments raised by NE regarding GCN had now been resolved. Accordingly, the matter was recorded as Agreed within the **Statement of Common Ground with Natural England [REP4-063]**. Since publication of this question, the Applicant has sought to reconfirm this position with Natural England. At the time of submitting this response, no further response has been received. Accordingly, the Applicant's understanding remains that Natural England is satisfied with

ExQ	Respondent	Question	Applicant's Response
			the proposed approach to GCN at the Solar PV Sites, as reflected in the agreed **Statement of Common Ground [REP4-063].**
EB2.5	Wiltshire Council	**White-Clawed Crayfish** The ExA notes Wiltshire Council's position in the SoCG item 3.5.20 [REP4-061] and it is now an 'Agreed' item. The Council is asked to explain its position given the potential conflict between maintaining its concerns over the lack of survey work and the wording of [REP4-091], pages 39 – 40. This raises question marks over whether this should be an 'Agreed' item. Further to this, should the applicant commit to a 10m buffer to all watercourses, the Council is asked to comment if this would address its concern over a lack of survey work.	Question not directed at the Applicant.
EB2.6	Stop Lime Down	**Brown hare** In Stop Lime Down's WR Appendix E paragraph 39 [REP1-173] you state that brown hare enjoys open fields, but the applicant provides no mitigation, so you question the potential impact on brown hares. In the applicant's response to ExQ1 EB1.12 [REP3-128], it	The Applicant notes this question is directed to Stop Lime Down. However, the Applicant highlights that the **Outline EPMS [REP4-055]** was updated at Deadline 3 with text at paragraph 3.3.5 in relation to ensuring fencing is permeable to wildlife, including brown hare.

ExQ	Respondent	Question	Applicant's Response
		comments that the security fencing is large enough to allow the passage of brown hare. You are asked to consider if this resolves your concerns and if not, what further mitigation would you expect to avoid impact on brown hare. If your position is that there is no possible mitigation, then please provide an explanation.	
EB2.7	The Applicant	**Skylark/ Nesting Birds Mitigation Areas** The applicant is asked to respond to each of the following questions regarding ground nesting birds. 1. Confirm that areas of mitigation are secured for the duration of the proposed development, and if not for a period of 60-years, how long. If the answer is less than 60-years how has this been accounted for within the ES. 2. In its response to ExQ1 EB1.18 [REP3-142], Wiltshire Council commented that hedgerows being kept at 4.5m in height has the potential to reduce open sight lines and increase predation thus reducing suitability of habitat for ground nesting birds. The applicant is asked how it has considered the effect of hedgerow heights when weighing effect of the proposal on skylark and the effectiveness of the mitigation areas. As	The areas required to provide environmental mitigation are secured for the duration of the authorised development. The mitigation areas are located within the Order limits and are included within the land over which the Applicant is seeking the rights necessary to construct, operate, maintain and ultimately decommission the Proposed Development. The delivery, retention and management of those areas are secured through the Requirements in Schedule 2 of the **draft DCO [REP4-004]**, including Requirement 7 concerning the Landscape and Ecological Management Plan and Requirement 8 concerning the ecological protection and mitigation strategy.

ExQ	Respondent	Question	Applicant's Response
		per the Council's suggestion, please detail why these hedgerows cannot be kept to a lower height to maximise the benefits of the mitigation areas, especially considering the adverse effect on skylark detailed in ES Chapter 9 [REP4-010]. In answering this ExQ the applicant is asked to weigh the potential ecology benefits against the landscape and visual effect of a lower hedgerow height at the ground nesting bird mitigation areas.	The obligations relating to operational mitigation apply throughout the operational lifetime of the Proposed Development and, where applicable, until the completion of decommissioning and restoration. The Environmental Statement assesses the Proposed Development on the basis of an operational period of up to 60 years. The assessment therefore assumes that the mitigation relied upon to avoid, reduce or compensate for environmental effects will remain in place and be appropriately managed for the corresponding period. There is consequently no temporal shortfall between the duration of the mitigation relied upon in the Environmental Statement and the maximum operational period authorised by the draft DCO. For the avoidance of doubt, should the Proposed Development be decommissioned before the expiry of the maximum 60-year operational period, the operational mitigation would remain in place for the actual operational lifetime of the Proposed Development and would thereafter be

ExQ	Respondent	Question	Applicant's Response
			addressed through the approved decommissioning and restoration arrangements. With regards to part 2) of the question, the Applicant acknowledges that as a general rule increases in hedgerow height can reduce the suitability of farmland for skylark by restricting open sightlines and increasing the availability of elevated vantage points for predators. However, the ground-nesting bird mitigation fields have been selected following consideration of a range of characteristics, with particular emphasis placed on their large size and relatively flat topography. These characteristics provide extensive areas of open habitat well away from field boundaries and other edge features. Other selection criteria considered was the influence of adjacent woodland and the absence of other features that could provide elevated vantage points for predators, such as tall in-field trees away from field boundaries. Whilst some mitigation fields are bounded by hedgerows that will be managed at up to 4.5 m

ExQ	Respondent	Question	Applicant's Response
			above ground level, the Applicant does not consider that this would materially reduce the effectiveness of the mitigation. The extensive size and open nature of the selected fields mean that suitable nesting habitat remains available at substantial distances from field boundaries, such that skylarks are not reliant on maintaining low hedgerows around the entirety of the selected field perimeter. Consequently, although hedgerow height is a relevant consideration, it is not the primary factor influencing the selection of mitigation fields and is not considered critical to their ability to deliver the intended mitigation. The Applicant therefore maintains that the proposed ground-nesting bird mitigation areas remain suitable to compensate for the predicted loss of skylark breeding habitat and that the management of adjacent hedgerows of up 4.5 m does not undermine this conclusion. Notwithstanding, the Applicant confirms that the management of hedgerows has been revised so that not all hedgerows are managed to 4.5m and there is flexibility in the

ExQ	Respondent	Question	Applicant's Response
			design to accommodate specific species and management objectives, including at hedgerows bordering skylark mitigation areas. A revised Hedgerow Height Plan has been submitted at Deadline 5 (see Appendix 2 of the **Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54]**) which shows hedgerows bordering skylark mitigation areas at Fields A11, A12 and B12 will be managed at existing heights and not up to 4.5 m. The western boundaries of mitigation areas at Fields C1, C6 and C10 will also be managed at lower heights (minimum of 1.5 m or existing if greater) to preserve open views as previously set out in the **Outline Landscape and Ecological Management Plan (LEMP) [REP3-100].** At other boundaries of skylark mitigation areas, such as C24 and the eastern boundaries of C1, C6 and C10, hedgerows will be managed at heights of up to 4.5 m to address landscape and visual impact issues. A revised **Outline LEMP [REP3-100]** has been submitted at Deadline 5 to

ExQ	Respondent	Question	Applicant's Response
			confirm the lower management heights of hedgerows at A11, A12 and B12. These amendments have been made to provide additional assurance regarding the long-term suitability of the mitigation areas.
EB2.8	Natural England The Applicant	**Barn Owls/ Nesting Birds/ Overwintering Birds** <u>Natural England:</u> Please provide comment on the applicant's approach to avian species including barn owls, nesting birds and overwintering birds with respect to survey methodology and results, or lack thereof. Specifically, the ExA request that you consider the applicant's approach in the CRC of assuming the presence of species, as opposed to undertaking species surveys. You are also asked to consider the merits of the applicant's approach in the control documents relating to avian species. In providing your response you are invited to review the contents of the applicant's Statement of Common Ground (SoCG) with Wiltshire Council [REP4-063] sections 3.5.18 and 3.5.19. <u>The Applicant:</u> You are asked to clarify table 3 of the oCEMP [REP4-049] and whether you will seek to undertake	The Applicant confirms that, wherever reasonably practicable, construction activities with the potential to affect nesting and overwintering birds would be programmed to avoid periods of seasonal sensitivity. However, given the scale and complexity of the Scheme, together with the need to maintain flexibility within the construction programme, it is not considered proportionate or necessary to preclude all such works during sensitive periods. Table 3 of the **Outline Construction Environmental Management Plan (CEMP) [REP4-049]** should be read in conjunction with the **Outline EPMS [REP4-055**]. which sets out in more detail measures required where works are proposed during sensitive seasonal periods for avian species.

ExQ	Respondent	Question	Applicant's Response
		works outwith seasonal sensitivities for avian species before considering forms of mitigation and, if so, how this will be controlled and monitored and what this might mean for the overall construction timetable. Equally, if you consider that works within seasonally sensitive times is appropriate, please provide a justification and how your approach would be consistent with the mitigation hierarchy. ****In answering this question, the applicant and Natural England are requested to consider whether the response should be kept confidential under Regulation 12(5)(g) of the Environmental Information Regulations 2004. If that is the case both parties are requested to provide a copy of their confidential response directly to Wiltshire Council, Natural England and the applicant at deadline 5, as appropriate. When submitting the response to the Planning Inspectorate, it should be redacted and marked appropriately, with a separate confidential unredacted copy issued for ExA eyes only.****	Works would only be undertaken during the bird nesting season where it has first been confirmed, through appropriate pre-construction checks undertaken by a suitably qualified Ecological Clerk of Works (EcoCoW), that no ecological constraints, such as active nests, are present within the area affected by the works. Where active nests are identified, the mitigation hierarchy would continue to be applied. In the first instance, impacts would be avoided by delaying works until nesting activity has ceased and the nest is no longer active. For most species, this would typically result in a delay of a small number of days or weeks rather than months. Where delaying works is not reasonably practicable and it is appropriate to do so, suitable avoidance measures, such as the establishment of species-appropriate exclusion or protection buffers around active nests, would be implemented to ensure that nesting birds are not disturbed until young have fledged and the nest is no longer in use.

ExQ	Respondent	Question	Applicant's Response
			Construction activities would only recommence once the (EcoCoW) has confirmed that it is appropriate to do so. This approach is detailed in, and secured by, Method Statements 5 and 10 of the **Outline EPMS [REP4-055].** Similarly with respect to wintering birds, an inspection of new fields (i.e. in fields where works have not yet begun) immediately prior to the commencement of works where they take place during the winter will be undertaken by the EcoCow. This will identify any flocks of birds susceptible to disturbance by cable installation works. If such flocks are identified, works will be delayed until the flocks have moved on, to avoid impacts as far as possible. This is secured as part of Method Statement 11 of the **Outline EPMS [REP4-055].** The Order Limits are not located in close proximity to large waterbodies, coastal habitats, estuaries or wetland areas where flocks of waterfowl or wading birds often exhibit strong site fidelity to communal winter roosts or foraging areas, and regularly utilise the same surrounding fields.

ExQ	Respondent	Question	Applicant's Response
			In contrast, wintering farmland birds such as thrushes, corvids and other smaller passerines likely to occur within the Order Limits can generally be expected to exhibit a looser association with individual fields, moving between suitable foraging areas in response to local conditions. Consequently, adoption of this approach is only likely to result in a short delay, typically of no more than a few days, before birds relocate to alternative nearby foraging habitat. Both approaches are consistent with the mitigation hierarchy, with avoidance being the primary objective through both programming of works where practicable and site-specific ecological checks immediately prior to construction. Mitigation measures are only required where ecological constraints are identified and avoidance through programme changes alone is not feasible. Compliance with these measures would be overseen by the Ecological Clerk of Works in accordance with the **Outline EPMS [REP4-055]**, with monitoring undertaken throughout the construction phase to ensure that

ExQ	Respondent	Question	Applicant's Response
			ecological commitments are implemented effectively. The Applicant therefore considers that the approach set out within the **Outline CEMP [REP4-049]** and the **Outline EPMS [REP4-055]** provides an appropriate balance between protecting birds and allowing sufficient flexibility in the construction programme. Whilst ecological constraints may require localised delays to particular activities where active nests are present, these would be expected to be limited in extent and managed through normal construction programming, and are not anticipated to have a material effect on the overall construction timetable.
EB2.9	The Applicant	**Socio-Economic/ Ecology – Agri-Environment Schemes** The applicant's response to ExQ1 EB1.4 only refers to land in the solar PV sites [REP3-128]. The original question requested details across the entire Order limits. It has now come to light that works in the CRC could have an adverse effect on agri-environment schemes. For example, [REP4-120] and [REP4-115] demonstrate concern that the laying of the cable could have an	The Applicant acknowledges that the response to ExQ1 EB1.4 focussed on land within the Solar PV Sites and welcomes the opportunity to clarify the position in respect of the Cable Route Corridor. The Applicant recognises that, in some instances, temporary construction activities within the Cable Route Corridor may affect land that is currently subject to agri-

ExQ	Respondent	Question	Applicant's Response
		adverse effect on an extant agri-environment scheme meaning the landowner may not be able to meet their obligations. If the proposal adversely affects a landowner or farming tenant's ability to meet requirements of an agri-environment scheme or similar how has this been considered within the applicant's assessment in terms of establishing baseline and quantifying the effects of the proposed development. In providing a response the ExA also requests that the applicant provides a separate comment from a socio-economic perspective and how the potential impact on agri-environment schemes adversely affects existing businesses.	environment schemes or similar land management agreements. Where such agreements are in place, temporary disturbance associated with cable installation could affect a landowner's or tenant's ability to comply with the requirements of the relevant agreement for the duration of the works. From an ecological perspective, the existence of an agri-environment agreement has not been used as a baseline receptor in its own right within the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-011].** Rather, the assessment of effects on ecology is based on the habitats and ecological features present, irrespective of the mechanism by which those habitats are being managed. The ecological baseline therefore reflects the actual ecological conditions established through baseline survey. Consequently, any temporary interruption to an agri-environment agreement does not alter the ecological baseline or the assessment of likely significant effects on ecological features, provided the affected

ExQ	Respondent	Question	Applicant's Response
			habitats are reinstated in accordance with the commitments secured through the DCO. The **Outline Environmental Protection and Management Strategy (Outline EPMS) [REP4-055]** includes commitments to reinstate temporarily impacted habitats following completion of the works. Where habitat creation or management associated with an agri-environment agreement is temporarily affected, reinstatement would be undertaken in accordance with the relevant habitat requirements, and the Applicant will continue to engage with affected landowners during detailed design and construction programming to minimise disruption as far as practicable. The Applicant notes that concerns raised in representations **[REP4-115]** and [**REP4-120]** relate principally to the commercial and contractual implications of temporarily affecting land subject to agri-environment agreements, rather than additional ecological impacts beyond those already assessed within **ES Chapter 9 [REP4-011**]. It is the responsibility of the landowner to apply to the Rural Payments Agency for a temporary

ExQ	Respondent	Question	Applicant's Response
			derogation over land within agri-environment schemes if the landowner does not consider that they will be able to meet their agri-environment scheme obligations. The Applicant confirms that evidenced losses arising from a derogation would be compensable and that an assessment of compensation for agri-environment schemes across the Cable Route Corridor has been included within the **Funding Statement [APP-019].**
EB2.10	The Applicant	**National Forest Designation** Relevant representation [RR-0007] raised specific concerns over how the proposal meets the terms of the National Forest designation. The applicant is asked to respond.	**Relevant Representation [RR-0007]** refers to the National Forest programme known as the Western Forest, aiming to deliver at least 2,500 hectares of woodland and tree habitats across Wiltshire, Gloucestershire, and the West of England. The programme was launched in May 2025 and is led by the Forest of Avon Trust, and has highlighted five Priority Areas for woodland creation and enhancement using the Forest of Avon Plan and Local Nature Recovery Strategies (LNRSs) for the region, including the Wiltshire LNRS.

ExQ	Respondent	Question	Applicant's Response
			Parts of the Scheme lie within Priority Area 3 (Upper Avon), namely all areas of the Cable Route Corridor located south of the M4. No areas of the Solar PV Sites are identified within a Priority Area for the Western Forest programme. Habitat creation, enhancement and management measures associated with the Scheme are proposed solely at the Solar PV Sites, as set out within the **Outline LEMP [REP3-100],** with the exception of habitat re-instatement measures within the Cable Route Corridor with the exception of habitat reinstatement following temporary construction impacts within the Cable Route Corridor. Consequently, no new woodland creation is proposed by the Scheme within Western Forest Priority Areas. Nonetheless, Scheme design and habitat creation and enhancement measures have considered the Wiltshire LNRS, which was in draft form prior to submission of the DCO application, as set out within the **Biodiversity**

ExQ	Respondent	Question	Applicant's Response
			Net Gain Assessment Report (Rev 4) [REP4-046]. Within the Cable Route Corridor habitat proposals are limited to re-instatement of temporarily impacted habitats following construction. The presence of the underground cable is not anticipated to preclude participation in the Western Forest programme. Whilst extensive woodland planting directly above buried cable infrastructure may require consideration of engineering constraints (as with all buried services), these constraints would apply only to a relatively narrow corridor. Given the limited footprint of the cable infrastructure relative to the wider landholding, the Applicant does not consider that the Scheme would materially constrain future participation in the Western Forest programme or significantly limit opportunities for woodland creation within the identified Priority Area.
EB2.11	The Applicant	**Hedgerow Removal** 1. The applicant is requested to update the Hedgerow Removal Plan within Annex A of	The Hedgerow Removal Plan within Annex A of the **Outline EPMS [REP4-055]** has been

ExQ	Respondent	Question	Applicant's Response
		the oEPMS [REP4-055] with reference to the maximum and minimum extents of removal at each location. The applicant should provide a clear commentary as to the control measures that ensure that it is not just assumed to remove the maximum extent of hedgerow at any given location. 2. The applicant is also requested to detail on the Hedgerow Removal Plan of the oEPMS [REP4-055] where hedgerows will not be replaced. 3. In addition to the above, the applicant is requested to update the relevant control documents, including the oCEMP [REP4-049] and oCTMP [REP4 057], to reflect the response to part 1) above.	updated to identify the minimum and maximum extents of hedgerow removal at each location. A range of hedgerow removal minimum and maximum extents have been identified within the Hedgerow Removal Plan corresponding to different elements of the Scheme. The minimum extent represents the Applicant's minimum expectation of the hedgerow removal required to construct the different elements of the Scheme based on the current design. The maximum extent identifies the worst-case extent of removal that may be required and has been included to retain an appropriate degree of flexibility during the detailed design stage. A more in-depth explanation is provided here: **Minimum extent.** This is the minimum extent of removal required to deliver the relevant element of the Scheme, derived from the design assumptions currently anticipated for that element. For example, the minimum hedgerow removal extents for internal access tracks at the Solar PV Sites are based on the parameters set out for access tracks required for the Solar PV Site (3.5 m wide) and BESS

ExQ	Respondent	Question	Applicant's Response
			Area and Substation Accesses (6 m wide) with Table 3-1 of **ES Volume 1, Chapter 3: The Scheme [APP-055]**, and takes into account where access tracks are currently shown to utilise existing gaps in the hedgerow at any one location. Similarly, at new access points from the highway network, the minimum hedgerow removal requirements have been calculated based on highways drawings, swept path analyses and visibility splay requirements expected and existing gaps in hedgerows at each location. The minimum extent therefore represents the extent of removal the Applicant would expect to be necessary were the Scheme constructed in accordance with the design as presently anticipated. **Maximum extent.** This is the upper limit of removal at each location, retained to provide the flexibility necessary at the detailed design stage. That flexibility is required to accommodate matters that cannot reasonably be fixed or determined at this stage, for example micro-siting of accesses and crossings, and ground conditions encountered during construction. Where a range is provided

ExQ	Respondent	Question	Applicant's Response
			therefore, the maximum extent represents the upper ceiling limit of removal (secured within the **Outline EPMS [REP4-055]**), whereas the minimum extent represents the Applicant's reasonable prediction of the removal likely to be required based on the current design. The Applicant notes that, for hedgerow removal associated with cable installation works, it is not possible to identify a minimum extent at this stage as this is subject to detailed design of the grid connection. Accordingly, for these locations the minimum and maximum extents shown on the Hedgerow Removal Plan are currently the same and represent the maximum potential extent of removal. The actual extent of hedgerow removal will be refined through the detailed design process and, where practicable, reduced below this maximum in accordance with the controls set out in the **Outline EPMS [REP4-055].** Additional text has been included within Method Statement 5 of the **Outline EPMS [REP4-055]** at Deadline 5 to clarify that, prior to any hedgerow removal works, the extent of

ExQ	Respondent	Question	Applicant's Response
			removal at each location will be determined through detailed design and construction planning, with the use of existing gaps in hedgerows prioritised wherever practicable to minimise the need for removal. The method statement also confirms that the maximum extents shown on the Hedgerow Removal Plan represent an upper limit and will not automatically be removed. Both the**Outline Construction Environmental Management Plan [REP4-049]** and the **Outline Construction Traffic Management Plan [REP4-057]** refer to compliance with the specific ecological protection and control measures set out in the **Outline EPMS [REP4-055].** With regard to part 2 of the question, the Applicant notes that the Hedgerow Removal Plan already distinguishes between permanent and temporary hedgerow removal. Sections requiring temporary removal, where hedgerows will be reinstated following completion of the works, are identified by green lines, whereas sections proposed for

ExQ	Respondent	Question	Applicant's Response
			permanent removal without reinstatement are identified by mauve (dark pink) lines. The Applicant refers the ExA to the plan legend for clarification.
EB2.12	The Applicant	**Biodiversity Net Gain (BNG)** To ensure that there is no double counting of BNG, and confusing this with mitigation, the applicant is requested to provide additional clarification as to which measures/ proposed habitat creation fall within each of the relevant categories. To ensure clarity and future ease of monitoring you are requested to provide this information in a single document that details: • the type and quantum of habitat types that are being lost and the type and quantum of habitats and measures for species that are being replaced/ developed, and • state where these new sites will be (field numbers, for example), and whether this will represent mitigation, compensation, enhancement or BNG. For linear features such as hedgerows this information should, as far as possible at this stage, be broken down into figures for each individual length of hedgerow that is	The Applicant has prepared a separate **Technical Note – Applicant's Response to EB2,12 – Biodiversity Net Gain & Additionality Technical Note [EN010168/EXAM/9.67]**, which is appended in response to this request. The Technical Note has sought to demonstrate how a considerable proportion of the Schemes calculated Biodiveristy Net Gain Units (significantly more than 10%) has been delivered through measures not required to mitigate or compensate identified impacts on ecological features assessed and presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-011].**

ExQ	Respondent	Question	Applicant's Response
		proposed to be removed and figures for what is proposed to be re-planted at the original location or to be compensated for with planting elsewhere. Whilst the ExA appreciates that the full details might not be available until the detailed design stage, the applicant is requested to provide its best estimate prior to detailed design, based on what has been assessed in the ES. The ExA considers that a table format would best present this information.	
EB2.13	The Lead Local Flood Authority The Applicant	**Ordinary Watercourse Buffers** The LLFA: The EA's post-hearing submission [REP4-097] provides details of why a 10m buffer from the bank top of sensitive watercourses is appropriate. However, they defer to the LLFA for ordinary watercourses. Please confirm your expectation with respect to buffers to protect ordinary watercourses. The Applicant: The applicant is asked to justify why it considers a lesser buffer of 8m is acceptable, especially given its approach to assume the presence of protected species in each habitat type and the position of the EA as per the post-hearing submission [REP4-097]. This should provide	Further to the detail provided in the **Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points [REP4-086],** the Applicant maintains that a minimum 8 m buffer from ordinary watercourses is appropriate from an ecological standpoint. An 8 m buffer would fully safeguard the 5 m riparian zone, representing the bankside habitat functionally associated with the watercourse. It would also provide sufficient space for the establishment and long-term management of marginal and riparian vegetation, while safeguarding burrows and sheltering habitat for riparian species such as water voles, as

ExQ	Respondent	Question	Applicant's Response
		further detail to the post-hearing submission [REP4-086].	described in the **Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points [REP4-086]**. Furthermore, the buffer would provide an adequate corridor for other riparian species, including otters, to move and forage along the watercourse unhindered. Notwithstanding the Applicant's position that an 8 m buffer is sufficient, it is also important to note that the vast majority of ditches within the Solar PV Sites benefit from a substantially wider buffer because they are associated with hedgerows, tree lines or woodland edges. The Scheme applies a minimum 15 m buffer to all hedgerows, trees and woodland edges and, consequently, most ditches are afforded a buffer of approximately 15 m. The wider 15 m buffers in these locations are driven by the need to protect hedgerows, trees and woodland features, rather than the watercourses themselves, but nevertheless provide an additional ecological safeguard for the adjacent riparian corridor.

ExQ	Respondent	Question	Applicant's Response
			Only three ditches within the Solar PV Sites are not associated with a hedgerow, tree line or woodland edge and therefore have the minimum 8 m buffer applied. One of these is a ditch forming the boundary between Fields D9 and D10, where the presence of numerous water vole field signs were confirmed and a minimum 10 m has been applied, and no Solar PV Panels or Infrastructure is proposed for either field each side of the ditch. The other two ditches are both located within Lime Down C and comprise: (i) the ditch forming the boundary between Fields C32 and C33; and (ii) the ditch running west-east bisecting Field C7. This is illustrated in **ES Volume 3, Appendix 9-8 CONFIDENTIAL Schedule of Protective Ecological Buffers [APP-205].**
EB2.14	The Applicant Natural England	**Mitigation Hierarchy** The Applicant: The applicant's approach to species in the CRC assumes the presence of species and intends to rely on mitigation to avoid harm such as pre-	The Applicant does not consider it appropriate or necessary to commit to a blanket restriction on undertaking works outside of the optimal season (unless otherwise agreed) for all

ExQ	Respondent	Question	Applicant's Response
	Wiltshire Council	construction surveys to inform the cable installation route. Given the assumption of the presence of species the applicant is asked if it would commit to out of season works in relation to those protected species where they have assumed presence, unless otherwise agreed with Wiltshire Council in consultation with Natural England to an alternative. If the applicant is minded to agree to this approach, then it should update the relevant control documents accordingly beyond that already specified in table 3 of the oCEMP [REP4-049]. It should also provide details of those months where types of works will be avoided to protect the assumed presence of protected species. It is noted that the SoCG with Natural England confirms this approach for hedgerow removal to protect dormice [REP4-063], and the SoCG with the EA regarding coarse fish spawning [REP4-068]. Natural England and Wiltshire Council: Should the applicant agree to the above avoidance measure to protect ground nesting birds and other assumed presence of protected species do you consider that this would avoid any Likely Significant Effects (LSE) and meet with the terms of the mitigation hierarchy? If not, please provide details.	protected species assumed to be present within the Cable Route Corridor. The Applicant's assessment and mitigation strategy has been developed in accordance with the mitigation hierarchy and the principles of a Rochdale Envelope assessment. Given the linear nature of the Cable Route Corridor, temporary and relatively short-term works, and the flexibility retained within the Order Limits, the Applicant has assumed the presence of protected species where suitable habitat exists and has committed to a range of secured measures to avoid or minimise impacts during detailed design and construction. These include pre-construction surveys where required, ecological clerk of works supervision, micrositing, refinement of working areas, trenchless installation techniques at sensitive locations where appropriate, and the implementation of species-specific method statements and licensing where required. The Applicant considers that committing to seasonal restrictions associated with all

ExQ	Respondent	Question	Applicant's Response
			protected species (unless otherwise agreed) would not be proportionate, as the appropriate timing of works varies considerably between species, habitats and the nature of the activity being undertaken. Furthermore, in many cases impacts can be appropriately avoided through detailed design, micrositing or sensitive methods of works (with ecological supervision) without avoiding certain seasonal constraints. A blanket restriction could also unnecessarily constrain construction programming without delivering additional ecological benefit. Where seasonal restrictions are necessary to avoid significant effects, these have already been incorporated into the **Outline EPMS [REP4-055]**. control document. Examples include restrictions on undertaking vegetation removal during the nesting bird season, an inspection has confirmed the absence of active nests (Method Statements 5 and 10), and seasonal restrictions relating to in-channel works to protect coarse fish spawning (including in Method Statement 6). Additional seasonal constraints may also be identified

<table>
<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td></td><td>during detailed design where informed by pre-construction inspections for particular species.

The Applicant therefore considers that the existing approach, whereby seasonal restrictions are applied where they are necessary and proportionate based on the ecology of the species concerned and secured through the relevant management plans and licensing processes, provides a robust and appropriate framework. Accordingly, the Applicant does not consider that further blanket commitments or amendments to the control documents are necessary.</td></tr>
<tr><td>EB2.15</td><td>Wiltshire Council</td><td>Wiltshire Council Concerns

Wiltshire Council is requested to provide a summary of outstanding ecology concerns that relate to each element of the proposal in a table that highlights matters in the solar PV sites and/ or the CRC. A

<table><tr><th>Outstanding Issue (brief summary/ headline issue)</th><th>Solar PV Sites</th><th>Cable Route Corridor</th></tr><tr><td></td><td></td><td></td></tr></table></td><td>Question not directed at the Applicant.</td></tr>
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ExQ	Respondent	Question	Applicant's Response
		suggested layout is provided below:	
EB2.16	The Applicant	**Access Points – Mitigation Measures** ExQ1 EB1.20 [PD-010] asked the applicant: *Works Plan Sheet 9 [REP1-005] shows an access into Works Number 5A(v) via access number 102 [APP-010]. Although this is an existing access it needs to be improved to cater for construction traffic, which would result in the removal of hedgerows, dry stone walling and a mature tree.* *You are asked to detail what design alternatives were considered to avoid and reduce damage to ecologically important features at this access, for example could access 101 have been used to allow for a turning area into 102 to avoid damage to ecological features? Furthermore, you are asked to detail your approach, with reference to the mitigation hierarchy and providing evidence, to selecting areas for construction compounds and access points generally, including widening and other works, to avoid and minimise damage at these locations to ecologically sensitive features.*	The Applicant confirms the following process was followed in order to select final access locations: **1.** Transport and access teams developed a series of initial access points based on the most suitable construction routes to the cable route corridor. **2.** Following this, potential access locations were screened by the design team to discount any locations which feasibly did not work from a design perspective; **3.** Subsequently, a series of design workshops were held during which the accesses were scrutinised by key environmental disciplines. Notably colleagues from ecology, LVIA and heritage inputted into these discussions using their knowledge from desk studies and relevant surveys to inform

ExQ	Respondent	Question	Applicant's Response
		The applicant provided a general overview of its approach to the design of access points but did not explain how individual accesses had been designed to avoid impacts on important ecological features, beyond stating that existing access points would be used where possible. In relation to access points 101 and 102, shown on Works Plan Sheet 9 [REP1-005], the applicant did not provide details of any alternative access arrangements considered to minimise or avoid the loss of trees and hedgerows. The applicant is therefore requested to provide further information on the design process used to avoid or minimise impacts on key ecological features when designing new access points or widening existing accesses. This should demonstrate that site-specific design considerations have been applied and that opportunities to avoid ecological impacts have been fully explored. In addition, the applicant is requested to provide a detailed explanation of the design approach for access points 101 and 102, including any alternative options considered and the measures taken to avoid or minimise the removal of trees, hedgerows and other ecological features.	recommendations as to whether to retain or remove access locations; and 4. Following the design workshops a final series of accesses were selected and shared with the rest of the project team for comment before final inclusion. The Applicant confirms this process was repeated at both PEIR and ES stage. During ES stage the first step was limited to a review of the originally developed transport and access points against the feedback received at Statutory Consultation in order to refine the accesses rather than starting the process from scratch. New access drawings will be provided at Deadline 6. The Applicant acknowledges the loss of the mature tree at Access 101 but notes that no other dense woody vegetation (such as hedgerows) would require removal to facilitate this access. At this location, the field boundary is represented by a post-and-wire fence and a low wall fronting the road, rather than an

ExQ	Respondent	Question	Applicant's Response
			established hedgerow. Consequently, the access does not require the removal of an established hedgerow or other comparable linear woody habitat.
EB2.17	The Applicant Wiltshire Council	**Ancient Woodland – Surrendell Wood** The applicant's deadline 4 response to ISH3 Action Point 21 [REP4-086] refers to the use of an existing track that encroaches within the 15m buffer to Surrendell Wood. The ExA notes the applicant's position that use of the existing track would be less environmentally intrusive than the construction of a new access route. The Applicant: The applicant is requested to provide further evidence supporting this conclusion, including details of any surveys, assessments, existing levels of vehicular use, or other information relied upon in selecting this approach. The applicant should also explain how any potential effects on the ancient woodland would be monitored during construction and operation, and what mitigation measures would be implemented should adverse effects be identified. Wiltshire Council:	The Applicant considers that use of the existing agricultural access track represents the least environmentally intrusive option when compared with the construction of a new access route. The track has been in regular use for agricultural purposes for a long period of time, including by heavy agricultural machinery, and continues to function as an established farm access. As such, the ground beneath the existing track is already subject to ongoing disturbance and compaction associated with agricultural operations. Whilst no quantitative assessment of existing traffic levels has been undertaken, the Applicant considers that utilising this existing access avoids the additional environmental effects that would arise from constructing a new track through previously undisturbed land. Construction of a new access would require the removal of a section of existing hedgerow,

ExQ	Respondent	Question	Applicant's Response
		Having regard to the applicant's deadline 4 response to ISH3 Action Point 21 [REP4-086], the Council is requested to set out its position on the proposed use of the existing access track within the 15m buffer to Surrendell Wood. In particular, the Council should identify: • its specific concerns regarding use of the existing track; • whether it agrees that use of the existing track would be less intrusive than the creation of a new access route; and • any additional mitigation, monitoring or controls that it considers necessary.	together with associated vegetation clearance, excavation, ground preparation, the importation of construction materials and additional plant movements. It would also result in permanent disturbance to soils and root protection areas that are currently unaffected. By reusing the existing track, the need for these works is avoided, thereby minimising habitat loss, reducing the extent of ground disturbance and aligning with the mitigation hierarchy by avoiding environmental impacts where reasonably practicable. Potential effects on the adjacent ancient woodland will be managed through the measures secured within the **Outline Construction CEMP [REP4-049]**. These include the installation of protective fencing to prevent encroachment into the retained woodland buffer, implementation of a Dust Mitigation Plan, controls on construction activities in proximity to retained trees, and the preparation of a detailed Arboricultural Method Statement (AMS). The AMS will set out the specific protection measures for construction

ExQ	Respondent	Question	Applicant's Response
			adjacent to Surrendell Wood, including supervision requirements where necessary, inspection of protective fencing throughout the construction period, and procedures for addressing any damage or non-compliance identified during construction. These measures will ensure that any risks to the adjacent ancient woodland are appropriately monitored and managed throughout the construction phase. During operation, no routine maintenance activities are anticipated to affect the adjacent ancient woodland beyond continued use of the existing access track. Accordingly, no operational effects beyond those already associated with the existing agricultural use are anticipated.
EB2.18	The Applicant Wiltshire Council	**Trenchless Techniques – Protection of Root Systems and Soil Structure** National Highways response to ExQ1 NH-008 [REP4-098] refers to concerns regarding the depth of trenchless techniques and the potential to damage root systems and/ or soil structure with respect to trees reference N/TPO7. National Highways remains unconvinced by the	The main risks to soil structure from cable installation are compaction by machinery and disruption due to excavation and reinstatement. With the trenchless system, these risks are largely confined to launch and reception pit areas only and the extent of disturbance to soil structures is therefore much less compared with open trench installation.

ExQ	Respondent	Question	Applicant's Response
		details of the applicant's approach and therefore considers these trees should form part of Schedule 12 of the DCO. The Applicant: You are requested to address National Highways' concerns regarding the proposed use of trenchless techniques in the vicinity of trees N/TPO7. Please identify: • the proposed minimum depths and offsets from root protection areas • the assessment undertaken to demonstrate that roots and soil structure will not be adversely affected • the management documents in which these controls would be secured • whether any amendments to dDCO Article 41, Schedule 12, or relevant management plans are proposed to address National Highways' concerns. Wiltshire Council: Although trees N/TPO7 are located on National Highways land, please provide your professional opinion	The trenchless system is anticipated to install cables at up to 2m depth where the material is most likely to either be structureless clay or limestone rock, the structures of which would not be adversely affected. As stated in Table 4 of the **Outline CEMP [REP4-049]**, HDD will be utilized to avoid damaging roots, maintaining a minimum depth of 1m to bypass the majority of roots, which typically exist in the upper 600mm of soil. All machinery used for trenchless solutions (e.g. HDD) will be situated outside the RPAs of retained trees. Entry and exit points for the trenchless solutions will be sited more than 15m from retained tree stems. Trenchless solution depths will exceed 1m under RPAs. Throughout construction, movement of machinery and storage of materials will be managed to prevent encroachment into RPAs.

ExQ	Respondent	Question	Applicant's Response
		on whether the applicant has demonstrated that the proposed trenchless techniques generally across the Order limits would avoid unacceptable impacts on tree root systems and soil structure. If not, please specify: • what additional information is required • whether additional mitigation or controls should be secured • the mechanism by which such controls should be secured • any revised drafting considered to be necessary to the dDCO.	In the event that access is required, temporary ground protection will be employed to safeguard the tree roots. The above measures are included within **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**, and apply to N/TP07. The Contractor is to comply with the measures set out in the Arboricultural Method Statement. A detailed Arboricultural Method Statement, based on post-DCO detailed design, will be produced prior to construction commencing and will be included within the detailed CEMP.

2.9 Flood Risk, Hydrology and Water Resources

Table 2-9 Flood Risk, Hydrology and Water Resources

ExQ	Respondent	Question	Applicant's Response
FHW2.1	The Applicant	**Surface Water Assessment - Fluvial and Surface Water Flood Risk Maps** As a result of ExQ1 FHW1.3 the applicant reviewed the Fluvial and Surface Water Flood Risk maps (included as ES Volume 2 Figures 11-1 to 11-7) [REP3-027] to [REP3-033] and outline drainage strategies (included as ES Volume 3, Appendices 11-2 to 11-8) [REP4-021] to [REP4-036]. After reviewing the information submitted, the ExA requests the applicant to: 1. Show how existing drainage features, ditches, watercourses, overland flow routes and proposed drainage measures relate to the fixed or committed Scheme infrastructure. Although the presence of ditches has been referenced in the outline drainage strategies they have not been included in the maps to provide a clear understanding of their interaction with	The Applicant has updated the relevant flood risk figures for submission at Deadline 5 to address the requirements of FHW2.1. The revised **ES Volume 2, Figures 11-1 to 11-7: Fluvial and Surface Water Flood Risk Maps [EN010168/APP/6.2]** (Revision 3): 1. show the existing drainage features, watercourses, ditches, overland flow routes and proposed drainage measures in relation to the indicative Scheme infrastructure. The figures will include all available Ordnance Survey mapped watercourses, together with the additional watercourses and wet ditches identified through the ecology surveys; 2. show the indicative orientation and dimensions of the Solar PV Panels; 3. align the indicative number and location of conversion units and substation switch rooms with the updated **ES Volume 3, Appendices 11-2 to 11-8: Flood Risk Assessments and**

ExQ	Respondent	Question	Applicant's Response
		other hydraulic features. The applicant should correct this and include them. 2. Show the indicative orientation and size of the proposed PV panels. 3. Ensure that the number of conversion units/ substation switch rooms shown in the maps correlate to those in the outline drainage strategies. 4. Include the substation for Lime Down A. 5. Show clearly the location and extent of the access tracks that require formal attenuation.	**Drainage Strategies [EN010168/APP/6.2]** (Revision 3); 4. include the indicative Lime Down A substation; and 5. identify the access tracks which have been conservatively assessed as requiring formal attenuation. The figures will remain indicative and within the maximum design parameters for the Scheme. Final infrastructure and drainage arrangements will be confirmed through detailed design in accordance with the drainage principles and controls secured through the DCO.
FHW2.2	The Applicant The Lead Local Flood Authority	**Surface Water Assessment - Outline Drainage Strategies** The outline drainage strategies and covering report are included in the ES Volume 3 (Appendices 11-2 to 11-8 [REP4-021, REP4-023, REP4-025, REP4 027, REP4-029, REP4-031, REP4-033, REP4 035]). Within the site-specific outline drainage strategies, the applicant analysed and quantified surface water run-off arising from the introduction of infrastructure (substations, conversion units,	The Applicant has updated **ES Volume 3, Appendices 11-2 to 11-8: Flood Risk Assessments and Drainage Strategies [EN010168/APP/6.2]** (Revision 3) for submission at Deadline 5. The updates address points 1 to 8 as follows. 1. Access tracks The updated strategies distinguish between internal access tracks within the Solar PV Sites and access tracks serving major infrastructure, including the BESS and 132 kV and 400 kV substations, based on their

ExQ	Respondent	Question	Applicant's Response
		distribution switch rooms and some access tracks). After reviewing the information submitted, the ExA requests the following changes to the outline drainage strategies. <u>The Applicant:</u> 1. The applicant explains in the strategies that *Internal access tracks within the Solar PV Panelled Areas will be formed using permeable materials and, where practicable, maintained at existing ground levels. These tracks are not treated as positively drained hardstanding surfaces requiring formal attenuation, except where specifically and conservatively assessed within this Outline Drainage Strategy, such as the 132kV Substation access track.* The applicant should explain in the strategies the differences between the access tracks to understand the reasons and the location of those requiring formal attenuation and those which would not. If	construction, intended use and drainage characteristics. Internal access tracks will generally comprise hardcore or gravel over a levelling layer and will be designed to remain permeable, where practicable. They will also be maintained at existing ground levels, where practicable. Rainfall will therefore continue to infiltrate or dissipate across the surrounding ground without positive drainage, maintaining existing drainage pathways. These tracks are not treated as impermeable hardstanding requiring formal attenuation. By contrast, access tracks serving the BESS and substations may require a higher load-bearing construction to accommodate major equipment deliveries, including transformers. For the purposes of the outline drainage assessment, these tracks have therefore been conservatively assessed as impermeable asphalt. This is a realistic worst-case assessment assumption and does not fix the final surfacing material. These areas are included within the formal quantitative drainage calculations and will be served by engineered SuDS, such as attenuation basins, swales or filter drains, as appropriate. The

ExQ	Respondent	Question	Applicant's Response
		this is due to soil compaction, the relevant environmental management plans should be reviewed to include reference to these access tracks and ensure that appropriate management and mitigation are in place for the lifetime of the development. 2. Include the correct number of conversion units/ sub distribution switch rooms for each plot in table 1 of the outline strategies. This should be corrected in the calculations and reflected within the body of the text and tables within the strategies. The applicant should ensure that the way information is presented is correct within the strategies and aligned with the information shown in all the strategies. 3. Table 2 of the strategies does not include the 1% Annual Exceedance Probability (AEP) plus 45% climate change event rates which is referred under the 'Extreme rainfall' section of the strategies. In some strategies, the table	updated strategies identify the tracks included within the formal drainage assessment. The distinction between the track types is based on their construction and drainage characteristics rather than an assumption of soil compaction. Potential compaction associated with the construction and use of access tracks will be managed through the updated **Outline Construction Environmental Management Plan [EN010168/APP/7.12]** (Revision 6), **Outline Operational Environmental Management Plan [EN010168/APP/7.13]** (Revision 6), **Outline Decommissioning Strategy [EN010168/APP/7.14]** (Revision 4) and the **Outline Soil Resources Management Plan [EN010168/APP/7.15]** (Revision 4), submitted at Deadline 5. 2. Conversion units and sub-distribution switch rooms The numbers of conversion units and sub-distribution switch rooms are being reviewed and aligned across the text, tables, calculations and figures within the updated strategies. The quantities presented will reflect the applicable maximum design parameters under the Scheme's

ExQ	Respondent	Question	Applicant's Response
		does not show the 1 in 100year (yr) run-off rates. Therefore, table 2 of all strategies should be reviewed and updated to show the discharge rates of all events (1 in 2yr, 1 in 30yr, 1in 100yr, 1in 100yr plus 45% climate change, 1 in 2 yr +30% betterment), the proposed discharge rates and attenuation volumes. 4. The applicant is asked to review the 'required additional depths' for the conversion unit/ sub distribution switch rooms included in the 'Everyday Rainfall' section of the strategies as some appear unusual. Also ensure that the contributing area includes all the units to ensure consistency between strategies. Some strategies add the area of all units whereas others show only one unit. 5. The Causeway Flow hydraulic calculations are included in Appendix E of the strategies. However, some strategies do not show all elements assessed and, in most cases, the	design envelope. The final number and location of units will be confirmed through detailed design. 3. Runoff rates and attenuation volumes Table 2 of each strategy is being reviewed to ensure that the existing greenfield runoff rates and proposed restricted discharge rate are presented consistently. The proposed discharge rate is fixed at 70% of the existing 1 in 2 year greenfield runoff rate. This provides the 30% betterment required by Wiltshire Council policy and has been agreed in principle with the LLFA. The restricted discharge rate applies across the assessed rainfall events. Attenuation will be provided for the governing 1% AEP event including the applicable climate change allowance. The baseline greenfield runoff rates for the other return periods are already provided within the supporting calculations. These values will be brought into the main body of the strategies for ease of reference. The Applicant sought clarification from the ExA through the Planning Inspectorate case team. The ExA confirmed that the request was intended to ensure consistent information is presented across the strategies and does not require separate indicative

ExQ	Respondent	Question	Applicant's Response
		dimensions and estimated required volumes are not clear in the calculations. Therefore, Appendix E should be reviewed in all strategies to ensure that it contains the calculations for all the elements assessed, their correct dimensions and the estimated required volumes. Please ensure that the dimensions and estimated required volumes are highlighted within the calculations. 6. Some strategies contain an appendix showing sustainable drainage systems (SUDS) maintenance schedules and others do not. Please ensure consistency between strategies. 7. The applicant committed in [REP3-128] to provide conceptual drainage layouts for the BESS and substation locations by deadline 4. The outline drainage strategy for Lime Down D [REP4-031] does not include a figure showing the conceptual drainage layout. This should be added. 8. The ExA asked the applicant in EXQ1 FHW1.16 to consider the use of	attenuation volumes to be calculated for each lesser return period at this stage. The updated strategies therefore show the maximum indicative attenuation volume for the governing 1% AEP event including the applicable climate change allowance. They also include a clear commitment for calculations for all relevant events to be completed at detailed design. Producing separate outline-stage volumes would require the calculations for each site and return period to be rerun, checked and incorporated into the relevant strategy, but would not alter the fixed restricted discharge rate or the governing attenuation requirement. The attenuation volumes presented within the outline strategies are necessarily indicative. A key input is the final impermeable or hardstanding area, which cannot be confirmed until detailed design. The areas currently assessed are conservative and are based on the relevant option areas or maximum design parameters. The resulting attenuation volumes should not therefore be treated as fixed detailed design values. The secured drainage principles remain that discharge will be restricted to 70% of the existing 1 in 2 year greenfield runoff rate and sufficient attenuation

ExQ	Respondent	Question	Applicant's Response
		rainwater harvesting. We note that, although the applicant has included references to rainwater harvesting in the drainage strategies, they are considered as unsuitable in Table 3. The ExA understands that it cannot be used as the sole means of disposal of excess water, however, it may be used in combination with other SUDS, to water new planting, to support fire water replenishment, etc. Can the applicant consider this and provide a response? <u>The LLFA:</u> 9. The applicant explains in the outline drainage strategies that surface water run-off will be discharged at controlled rates in line with greenfield runoff principles and the LLFA requirement for 30% betterment. Table 2 of the drainage strategies shows that the 30% betterment is calculated using the 1 in 2yr event. Can the LLFA please confirm agreement with the events assessed and the proposed betterment?	will be provided for the 1% AEP event including the applicable climate change allowance. 4. Everyday rainfall assessment The "Everyday Rainfall" assessments are being reviewed to ensure that: • the contributing areas include all applicable conversion units and sub-distribution switch rooms; • the required additional depths are calculated consistently; and • the calculation approach and results are presented consistently across the strategies. 5. Causeway Flow calculations The Causeway Flow calculations appended to each relevant strategy will be checked before submission to confirm that: • the total assessed hardstanding area corresponds with the infrastructure included in the drainage assessment; • the committed restricted discharge rate and applicable design event, including the climate

ExQ	Respondent	Question	Applicant's Response
		10. Can the LLFA consider if the proposed attenuation volumes are likely to be achieved through the proposed SUDS? This is particularly relevant for Lime Down D as the volume to be attenuated is large. The LLFA may want to liaise with the relevant Wiltshire Council ecology colleague to understand how SUDS may interact with the proposed ecological enhancements.	change allowance, have been correctly applied; • the resulting indicative attenuation storage volume is clearly identifiable within the calculation output; and • the inputs and resulting storage volume are consistent with the corresponding summary table in the drainage strategy. The calculations are intended to quantify the indicative attenuation storage requirement from the stated inputs. They are not intended to define separate drainage arrangements or fixed dimensions for each individual item of infrastructure. The body of each relevant drainage strategy will therefore clarify that the final technology, equipment layout, finished levels, contributing catchments and drainage configuration remain subject to detailed design. It will also explain that the generic tank or storage unit shown in the Causeway Flow output is a nominal software unit used solely to derive the required storage volume and does not represent a proposed tank, drainage feature or fixed drainage dimensions. The assessment conservatively assumes that runoff from the total identified hardstanding area will be

ExQ	Respondent	Question	Applicant's Response
			managed through a controlled drainage system and demonstrates that the resulting attenuation requirement can be accommodated within the available land using one or more appropriate SuDS or other attenuation features. This is a commonly applied approach at outline design stage for establishing the potential storage requirement and demonstrating drainage feasibility. Preparing separate calculations and fixing dimensions for each individual infrastructure component would not be proportionate at this stage. It would require substantial additional work based on technology and layouts that remain subject to change, while providing little additional value to the assessment of flood risk. It could also imply a level of design certainty that does not yet exist and unnecessarily constrain the subsequent optimisation of the Scheme. The Applicant has instead committed to the governing drainage principles, including the restricted discharge rate, applicable design standard and provision of sufficient attenuation. The final contributing catchments, conveyance system, storage type, location, dimensions and required volumes will be recalculated and verified against the final technology and layout at detailed design, in accordance with the

ExQ	Respondent	Question	Applicant's Response
			relevant drainage strategy and Requirement 5 of the **draft DCO [REP4-004]**. • includes all drainage elements assessed; • uses the correct dimensions and contributing areas; • clearly identifies the estimated attenuation volumes; and • highlights the principal dimensions and required volumes within the calculation outputs. 6. SuDS maintenance schedules Consistent indicative SuDS inspection and maintenance schedules will be included within each updated strategy. These will address the drainage measures relevant to each site and will remain subject to confirmation through detailed design. 7. Lime Down D conceptual drainage layout A conceptual drainage layout will be included within the updated **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy, Lime Down D/BESS [EN010168/APP/6.3]** (Revision 5).

ExQ	Respondent	Question	Applicant's Response
			The figure will show the indicative drainage catchments, attenuation measures, conveyance features and discharge arrangements associated with the BESS and substations. The arrangement will remain indicative and will be confirmed through detailed design. 8. Rainwater harvesting Rainwater harvesting has been reconsidered as a potential supplementary measure. The updated strategies will distinguish between its use as a primary surface water management measure and its potential supplementary use. Rainwater harvesting will not be relied upon to provide formal attenuation because there is no consistent water demand that can be guaranteed to maintain the required storage capacity during the design rainfall event. It may nevertheless be considered at detailed design for supplementary uses, including landscape establishment or replenishment of dedicated water storage, subject to operational, water quality and fire safety requirements. Any use of harvested rainwater would be additional to the formal drainage strategy. No allowance will be made for it within the attenuation calculations, and it

ExQ	Respondent	Question	Applicant's Response
			will not be relied upon to satisfy the committed firewater provision. Questions 9 and 10 are directed to the LLFA.
FHW2.3	The Environment Agency The Lead Local Flood Authority	**Flood Risk Assessment – Hydraulic Modelling** The EA, in its hearing submission [REP4-097], explains that for Lime Down D modelling there are unresolved issues regarding the data used and missing information and requests further information from the applicant. The applicant submitted at deadline 4 the hydraulic modelling report for Lime Down E2 [REP4-089]. <u>The Environment Agency:</u> 1. Can the EA confirm if all the required further information for Lime Down D modelling has been submitted? 2. Can the EA please provide an update of the review of the hydraulic modelling for Lime Down E2 at deadline 5 confirming if further information is required and	The questions under FHW2.3 are directed to the Environment Agency and the LLFA. To assist their review, the Applicant has submitted an updated **Lime Down D Hydraulic Modelling Report [EN010168/EXAM/9.32]** (Revision 2) at Deadline 5. This will incorporate the additional information requested by the Environment Agency, including the supporting FEH hydrological information and the extended detailed channel survey of Gauze Brook. The Applicant notes that the **Lime Down E2 Hydraulic Modelling Report [REP4-089]** remains subject to review by the Environment Agency. The Applicant's position regarding the ordinary watercourse between fields D22 and D1, including the maintenance of conveyance, protection of the watercourse and relevant consenting requirements, remains as set out in its response to ExQ1 FHW1.12 in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**. The Applicant will have regard to the LLFA's response as to

ExQ	Respondent	Question	Applicant's Response
		highlighting any significant issues found? The LLFA: 3. Considering the EA response to ExQ1 FWM1.4 (2) [REP3-146], the outputs from the applicant's Gauze Brook and Rodbourne Brook modelling which include the 3.33% AEP scenario and the evidence presented by the Stop Lime Down report [REP1-176], does this information support an extension to Flood Zone 3b in Lime Down D? If so, to which fields? 4. If your response to question 3 is positive, please explain any potential impact on the sequential and exception tests results. The LLFA: 5. In your response to ExQ1 FHW1.12 [REP3-142] in relation to an ordinary watercourse running between the fields D22 and D1 you requested the applicant to:	whether any further assessment or controls are considered necessary.

ExQ	Respondent	Question	Applicant's Response
		• Undertake targeted topographic and channel survey of the watercourse corridor. • Provide proportionate hydraulic assessment (or equivalent evidence) to define flood extents, depths, and flow routes. • Demonstrate that the layout maintains conveyance, including appropriate stand-offs and no obstruction of flow paths. • Confirm how the watercourse will be protected and managed. • Address any consenting requirements for works affecting an ordinary watercourse. 6. Considering the modelling provided for Lime Down D and its review by the EA, is your response to ExQ1 FHW1.12 still relevant or do you consider that the available information and the applicant's existing commitments will suffice?	

ExQ	Respondent	Question	Applicant's Response
FHW2.4	The Lead Local Flood Authority The Applicant Stop Lime Down	**Flood Risk Assessment – Freeboard Allowance** The applicant explained in its response to ExQ1 FHW1.5 [REP3-128] that the *Manning calculations (…) were used to compare the assessed 1% AEP plus climate change levels with the conservative 0.1% AEP surface water mapping used for context, to understand local drainage pathways and to inform the micro-siting of infrastructure. (…) Manning calculations did not identify locations where the smaller ordinary watercourses or land drainage features would give rise to a significant flood risk to the Scheme, or where the Scheme would be likely to increase off-site flood risk through displacement of floodwater or interruption of existing flow routes. They also informed the micro-siting of infrastructure by helping to identify local flood flow pathways, indicative flood levels and areas where infrastructure should be avoided or managed through embedded mitigation. They were not intended to be a full dynamic hydraulic model of the catchments.*	Questions 1 and 3 are directed to the LLFA and Stop Lime Down respectively. In response to question 2, the Applicant confirms that the clarification requested by the Environment Agency was addressed through the documents submitted at Deadline 4. The **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP4-021]**, **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy, Lime Down D [REP4-031]**, **ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy, Lime Down E2 [REP4-035]** and **Design Principles and Parameters [REP4-043]** secure a minimum 0.6 m freeboard between the applicable design flood level, including climate change, and the lowest leading edge of any Solar PV Panel located within an area of flood risk. Avoidance through micro-siting remains the preferred approach. Where panels are located within the design flood extent, their height and tilt may be adjusted at detailed design to achieve the required freeboard while remaining within the maximum panel height parameters. Where the required freeboard cannot be achieved within those parameters, Solar PV Panels will not be located in that area.

ExQ	Respondent	Question	Applicant's Response
		The EA in its response to [REP3-146] agreed that the Manning Calculations had limitations but were useful to contextualise the 0.1% AEP extent of the Risk of Flooding from Surface Water (RoFSW) mapping. RoFSW mapping was used by the applicant as a proxy to understand fluvial flood risk from smaller ordinary watercourses due to the lack of information available. The EA considered that the assessment was proportionate. To address any uncertainty arising from the assessment the EA requested from the applicant a commitment to ensure 0.6m freeboard above the design flood event for any solar PV panels placed in areas of flood risk. The LLFA: 1. Considering your response to ExQ1 FHW1.5 [REP3-142] and the EA conclusions, can you please confirm agreement or otherwise with the EA conclusions regarding the Manning calculations and freeboard allowance commitment? The Applicant:	This approach does not amend the maximum design envelope or result in landscape and visual effects beyond those already assessed. At the Environment Agency SoCG meeting on 28 July 2026, the Environment Agency confirmed that the Deadline 4 clarification addressed its concern. No further document amendments are therefore proposed in response to this matter.

ExQ	Respondent	Question	Applicant's Response
		The applicant confirmed in [REP3-128] that (…) *sensitive electrical infrastructure within areas of modelled flood interaction will either be located outside the design flood extent or raised with a minimum 0.6 m freeboard above the design flood level, including climate change. For Solar PV Panels, sensitive electrical equipment mounted on the panels will also be set no less than 0.6 m above the design flood level, including climate change. The lowest leading edge of the panel itself is not sensitive electrical equipment and may sit lower, depending on the final fixed or tracker arrangement.* The EA required further clarity from the applicant regarding the freeboard applied to the lowest leading edge of the solar PV panels above the design flood level to ensure operability during a flood event for both Lime Down D and Lime Down E2 [REP4-097]. 2. Can the applicant provide the clarity requested by the EA? Please also consider the design parameters and any potential Landscape and Visual impacts in your response.	

ExQ	Respondent	Question	Applicant's Response
		Stop Lime Down: 3. Given your post hearing submission [REP4-132] please provide concise comments on the issues discussed above.	
FHW2.5	The Applicant	**Flood Risk Assessment – Compensatory Flood Storage** The EA [REP4-097] explains (issue EA-073) that *If it is not possible to locate the substation within Lime Down C1 outside of the mapped flood flow routes, further assessment will need to be undertaken at detailed design to determine if the placement of the substation within Lime Down C1 would increase flood risk elsewhere. If there is an increase to flood risk elsewhere, floodplain compensation will be provided, in consultation with the Environment Agency, to ensure that there is no increase in flood risk.* To address this the EA requests a new flood mitigation Requirement in the dDCO to provide an assessment of flood risk and a mitigation plan once the location of the substation has been confirmed.	The Applicant cannot confirm at this stage that the final Lime Down C1 substation will be located wholly outside the mapped flood flow routes, as its precise location and layout remain subject to detailed design within the relevant substation Work No area. Avoidance through micro-siting remains the preferred approach. The detailed design will therefore seek to locate the substation outside the mapped flow routes identified within **ES Volume 3, Appendix 11-4: Flood Risk Assessment and Drainage Strategy, Lime Down C1 [REP4-027]** and the associated flood risk figures. Where the substation cannot be located wholly outside the mapped flow routes, the detailed design will be supported by a site-specific flood risk assessment and, where required, proportionate hydraulic modelling. The assessment will demonstrate that the proposed

ExQ	Respondent	Question	Applicant's Response
		<u>The Applicant:</u> The ExA notes your response to question ExQ1 FHW1.12 [REP3-128] explaining that the preferred solution is avoidance through micrositing and, if not practicable, to use detailed design to maintain conveyance and storage so there is no increase in flood risk elsewhere. 1. Can the applicant confirm if the substation within Lime Down C1 will be located outside the mapped flood flow routes? If so, please provide a full explanation and how it will be secured through the DCO. 2. Provide a comment regarding the need for the flood mitigation Requirement and its wording.	layout maintains flood conveyance and storage and does not increase flood risk elsewhere. Mitigation may include localised land level manipulation, compensatory flood storage and other measures necessary to maintain existing flow routes and floodplain function. The precise form and extent of any mitigation will be determined through the detailed assessment. Once the detailed design and location of the substation has been finalised, Wiltshire Council will need to approve the details under Requirement 5. As part of the discharge of this requirement, the Applicant will need to confirm that there are no materially new or different environmental effects from those reported in the Environmental Statement (in accordance with Schedule 16). In order to provide this confirmation, the Applicant will need to submit the site-specific flood risk assessment and, where required, proportionate hydraulic modelling, referred to above. As the discharge of requirement process already ensures micro-siting is re-validated against the conclusions of the Flood Risk Assessment in the Environmental Statement, the Applicant does not

ExQ	Respondent	Question	Applicant's Response
			consider that an additional requirement within the DCO is necessary.
FHW2.6	The Lead Local Flood Authority	**Flood Risk Management – Cable Route** The ExA notes the LLFA's response to ExQ1 FHW1.6 [REP3-142] which requests further detail secured through method statements such as HDD, trenching controls, and drainage management plans. The SoCG [REP4-061] shows that Wiltshire Council is still negotiating with the applicant HDD commitments and HDD approval. The LLFA provided a helpful update at deadline 4 [REP4-091] showing the residual themes that need to be addressed and the overall position. However, this document does not in not include specific references to HDD, trenching controls and drainage management plans in relation to hydrology. The ExA notes the applicant's response [REP4-081] which refers to pre-construction surveys, addressing issues through the Water Management Plan (WMP), which is part of the oCEMP and the outline Soil Resources Management Plan (oSRMP). The applicant made changes to Table 5 of the oCEMP [REP4-049] to include the	Question not directed at the Applicant

ExQ	Respondent	Question	Applicant's Response
		protection of agricultural field drains (although a question about that has been put to the applicant in ExQ2 CA2.8(4). Can the LLFA please provide an update on this issue?	
FHW2.7	The Environment Agency The Lead Local Flood Authority	**Construction – Impacts on Flood Risk and Drainage** The EA requests in [REP4-097] (issue EA-051) a commitment to placing all construction compounds, material storage and plant outside of flood zone 3b and more detail about the mitigation to be implemented if compounds need to be located within the floodplain. The LLFA in [REP4-091] identifies the following issues as hydrology matters currently unresolved (noting that some of those issues can arise at other phases of the development, not just during construction): • *whether temporary drainage and sediment control measures during construction will be sufficiently robust;*	Question not directed at the Applicant

ExQ	Respondent	Question	Applicant's Response
		• *whether watercourse buffers and low-lying drainage pathways will be protected in practice;* • *whether site-specific hydrological sensitivities identified in the Lime Down A-E desk studies are translated into monitoring and management controls;* • *whether monitoring arrangements include clear triggers, responsibilities, reporting and corrective actions.* The oCEMP [REP4-049] includes a commitment in Table 5 to locate materials and compounds outside flood zone 3b and there is reference to monitoring requirements. Some of the other issues raised (temporary drainage, buffers) are also included in Table 5 either as standalone or as part of the WMP. <u>The EA and the LLFA:</u> Can you provide any further wording that you require in the oCEMP or other dDCO documents to address the impacts of construction on flood risk and drainage?	

ExQ	Respondent	Question	Applicant's Response
FHW2.8	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	**Construction – Water Management Plan** The applicant in its rebuttal to Wiltshire Council's response to ExQ1 FHW1.9 [REP4-081] indicates that *The Water Management Plan forming part of the detailed CEMP will provide the phase-specific construction drainage and exceedance arrangements. It will identify:* • *the existing drainage features and overland flow routes relevant to the construction phase;* • *the proposed temporary drainage and runoff controls;* • *the routing of flows exceeding the capacity of temporary drainage measures;* • *the interaction with compounds, haul routes, stockpiles, excavations and watercourse crossings; and* • *the measures required to maintain existing floodplain capacity and avoid diversion of flows towards sensitive receptors.*	The Applicant considers that water management should continue to be addressed through the detailed management plan applicable to each phase of the Scheme, rather than through a separate certified Water Management Plan covering the full lifetime of the development. The nature of the activities and controls differs between construction, operation and decommissioning. Phase-specific water management provisions can therefore respond to the detailed design of each relevant part as detailed management plans are prepared for each part, taking into account the working methods and site conditions applicable at the relevant time. They will be approved and secured through the existing DCO Requirements for the detailed CEMP, OEMP and Decommissioning Strategy. A separate approval mechanism is not considered appropriate given the specific water management measures will be different for each phase (and therefore are appropriately linked to the management plans of each phase). From a practical perspective, the specific water management measures applicable to the operational phase may not be known prior to commencement of any construction activity (which is when the plan would need to be discharged if it were secured

ExQ	Respondent	Question	Applicant's Response
		Some of the issues mentioned in the bullet points above are not included in the latest oCEMP [REP4-049]. All parties: 1. Given that the WMP is going to be an important management plan for the duration of this project (and also referred to in the oOEMP and the outline Decommissioning Strategy (oDS)) is it still adequate that it is approved through these documents, rather than being a standalone certified document? 2. If so, should it not have more overt relevance within the oCEMP, oOEMP and the oDS, possibly through the addition of a standalone section which explains its purpose, contents and links with other management plans, instead of being embedded in Table 5 of the outline management plans? 3. If a separate WMP that covers the lifetime of the development is the best way forward, please give reasons why.	through a separate requirement as it would need to be approved prior to the commencement of construction). The Applicant nevertheless agrees that the purpose and scope of the water management provisions can be more clearly identified. The updated **Outline Construction Environmental Management Plan [EN010168/APP/7.12]** (Revision 6), **Outline Operational Environmental Management Plan [EN010168/APP/7.13]** (Revision 6) and **Outline Decommissioning Strategy [EN010168/APP/7.14]** (Revision 4) have been updated at Deadline 5 to include a section expressly explaining the relevant phase-specific water management arrangements and their relationship with the other environmental controls. Appropriate cross-references will also be included within the updated **Outline Soil Resources Management Plan [EN010168/APP/7.15]** (Revision 4) and **Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]** (Revision 5), reflecting the relationship between water management, soil condition, erosion, sediment control and the protection of watercourses and ecological receptors.

ExQ	Respondent	Question	Applicant's Response
		Please also include information regarding the approval mechanism and consultees. 4. As water management will be key for other topics such as soil and ecology, should it also be referenced in the oSRMP, oEPMS and other outline management plans/strategies? If so, please set out which ones and the reasons why.	This provides greater clarity and integration without duplicating controls or creating a separate lifetime Water Management Plan.
FHW2.9	The Applicant	**Solar PV Panels - Environmental Management Plans** The ExA notes the applicant's response to question FHW1.1 [REP3-128]. The LLFA [REP3-142] requested the applicant to provide a more explicit assessment of panel-induced runoff processes, including how different panel sizes and configurations could influence runoff rates, flow concentration, and soil interaction. The applicant's position [REP4-083] is that irrespective of the selected panel dimensions or tracking configuration, the drainage impacts of the panels will be adequately addressed through the relevant outline management plans (oCEMP, oSRMP, oLEMP and oOEMP). The	The Applicant has considered the LLFA's request for a more explicit assessment of panel-induced runoff processes. Solar PV Panel dimensions, height, tilt and tracking position can affect the spatial distribution of rainfall beneath and between panel rows, including the location and concentration of runoff at panel edges. This is recognised in the published evidence. Elamri et al. (2018), *Rain Concentration and Sheltering Effect of Solar Panels on Cultivated Plots*, found that panel geometry and tracking strategy influence the local distribution of rainfall at ground level. However, that research did not establish a corresponding relationship between panel configuration and runoff at field or catchment scale. Cook and McCuen (2013), *Hydrologic Response of Solar Farms*, found

ExQ	Respondent	Question	Applicant's Response
		LLFA [REP4-091] also requested a clearer explanation of the relationship between these documents and how they collectively address runoff management, soil structure protection, compaction control, vegetation establishment, erosion prevention, watercourse buffers, temporary drainage, operational monitoring, remediation and corrective action. The applicant is asked to respond to both requests in detail and to also review the mitigation route map requested through ExQ1-GCT1.6 to reflect its response.	that panels did not significantly affect runoff volume, peak flow or time to peak where runoff discharged onto maintained grass, while identifying potential increases where the receiving ground was bare or gravelled and a risk of localised erosion at panel edges. The evidence therefore distinguishes between local rainfall redistribution and an increase in runoff leaving the site. Whether rainfall concentrated at a panel edge develops into increased runoff or erosion depends principally on the condition and permeability of the receiving soil, vegetation cover, compaction, slope and connectivity to drainage features, overland flow routes or watercourses. Panel dimensions or configuration alone do not provide a reliable basis for predicting a change in runoff at the field boundary. This approach is reflected in the **ES Volume 3 Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report [REP4-021]**, which recognises the potential for rainfall concentration beneath panel edges and identifies vegetation and soil management as the relevant controls. Those controls operate collectively through the following documents: • the **Outline Construction Environmental Management Plan [REP4-049]** controls

ExQ	Respondent	Question	Applicant's Response
			construction trafficking, temporary drainage, sediment and erosion, and the protection of existing drainage pathways; • the **Outline Soil Resources Management Plan [REP4-053]** controls soil handling and compaction and provides for inspection and remedial action where required; • the **Outline Landscape and Ecological Management Plan [REP3-100]** secures the establishment and maintenance of vegetated ground cover; and • the **Outline Operational Environmental Management Plan [REP4-051]** provides for monitoring and corrective action where sparse vegetation, bare ground, drip-line erosion, rilling or channelisation is identified. Watercourse buffers and the protection of existing drainage features and overland flow routes are secured through the **Design Principles and Parameters [REP4-043]** and the relevant environmental management plans. The documents therefore provide a continuous management framework. Construction controls protect soil structure and drainage pathways, the soil and

ExQ	Respondent	Question	Applicant's Response
			landscape plans secure suitable receiving ground and vegetation cover, and operational monitoring identifies and remedies any localised erosion or channelisation that develops. These controls apply to any Solar PV Panel dimensions or configuration selected within the assessed and secured design parameters. The Applicant therefore considers that the potential effects associated with different panel sizes and configurations have been appropriately assessed and are adequately controlled through the secured management plans. No further panel-configuration-specific assessment is considered necessary. The **Mitigation Route Map [EN010168/EXAM/9.59]** has been produced to identify the relevant measures, their relationship across the management plans, the associated monitoring and corrective actions, and the DCO mechanisms through which they are secured.
FHW2.10	The Lead Local Flood Authority	**LLFA Residual Themes** The LLFA in [REP4-091] identifies six unresolved residual themes but it considers them as capable of resolution through further	Question not directed at the Applicant

ExQ	Respondent	Question	Applicant's Response
		discussion and refinement. These issues relate to: • the integration of hydrology-related controls across documents • vegetation monitoring as a runoff and erosion control measure • recognition of the hydrological function of vegetation and soils • soil compaction monitoring and remediation • construction-phase drainage and water management • long-term monitoring, governance and performance triggers. 1. Considering the information submitted by the applicant at deadline 4, can you please provide an update on the residual themes at deadline 5? 2. If any further wording is needed in the environmental management plans to resolve these issues, can you please	

ExQ	Respondent	Question	Applicant's Response
		include it in your response, including the document and the wording required?	
FHW2.11	The Applicant	**Flood Risk to Farleaze Farm** The grounds of Farleaze Farm were visited on the ExA's accompanied site inspection (ASI) on the 11 June 2026. From there the ExA was able to appreciate that flood risk to the property may be exacerbated by surface water flowing into the railway drains that are not able to cope with existing surface water flows and so backs up into the grounds of the property during storms. The landowner of Farleaze Farm made representations at CAH1 on 30 June 2026 about flood risk and drainage issues as a Category 3 party. The ExA understood from the applicant that it had not had any direct engagement with the landowner, but he raised concerns that the applicant's assessment of the route around Pig Lane fails to account for the local topography, drainage network and existing trees, and that the convergence of the railway drainage system and Pig Lane at the lowest point will constrain the route and require a wider construction area than currently shown.	The Applicant has directly engaged with the landowner of Farleaze Farm prior to the July hearings, including during statutory consultation and through a site meeting in February 2025. This dialogue informed the iterative design process around the Fosse Way and included discussion of wider biodiversity net gain opportunities. The Applicant also facilitated changes during the pre-application phase to accommodate potential land ownership exchanges involving the landowner. Following Compulsory Acquisition Hearing 1, further engagement has been undertaken with the landowner regarding his concerns about the Scheme's potential impact on flood risk at Farleaze Farm and the local drainage network. The landowner also raised concerns regarding works recently commenced by Network Rail in the vicinity of the property, which he considers may alter the local drainage arrangements. The precise details of those third-party works are not currently known. The Applicant's previous reference to its ongoing engagement with Network Rail regarding protective provisions and a Framework Agreement was intended to confirm that it is seeking

ExQ	Respondent	Question	Applicant's Response
		The ExA notes the applicant's post hearing submission [REP4-084] which states that it is in discussions with Network Rail regarding protective provisions and a Framework Agreement; however, this does not address the concerns for Farleaze Farm. The applicant is asked to prepare an analysis to show how the infrastructure located around Farleaze Farm (specifically but not limited to the cable route works) in Lime Down C and west of Lime Down D will impact on the drainage of the area with a specific focus on the flows into the railway tracks and drains to ensure that the development will not increase flood risk to Farleaze Farm. The ExA expects more than a signposting to documents already in the Examination Library and requires a specific assessment of the implications for Farleaze Farm. The applicant should also identify and secure opportunities to reduce the causes and impacts of flooding at this property.	clarity from Network Rail regarding those works and their interface with the Scheme. The Applicant has reviewed the local topography, surface water mapping and drainage features around Farleaze Farm. The localised area of mapped flood risk within the landowner's property corresponds with the low point around the inlet to the culvert beneath the railway, as shown on **ES Figure 11-4: Lime Down C2 Fluvial and Surface Water Flood Risk Map [REP4-029]**. This is an existing drainage issue associated with the conveyance of surface water through the railway drainage infrastructure. The Solar PV Panelled Areas within Lime Down C will remain predominantly permeable and vegetated. Existing ground levels, overland flow routes and drainage pathways will be retained. The Scheme will therefore not materially increase the rate or volume of surface water runoff leaving the panelled areas or redirect flows towards Farleaze Farm or the railway. The infrastructure near Farleaze Farm and west of Lime Down D is predominantly the subsurface cable route. The cable infrastructure will be installed below ground and the working area reinstated following construction. It will not create a permanent impermeable catchment,

ExQ	Respondent	Question	Applicant's Response
			require standalone operational drainage or obstruct existing drainage pathways. During construction, temporary drainage and runoff controls will ensure that excavations, working areas and stockpiles do not divert or increase flows towards the property, the culvert inlet or the railway. These measures are secured through the Water Management Plan within the detailed CEMP, prepared substantially in accordance with the **Outline Construction Environmental Management Plan [REP4-049]**, and through the soil protection and reinstatement provisions of the **Outline Soil Resources Management Plan [REP4-053]**. Any works undertaken by Network Rail to its drainage infrastructure are separate from the Scheme. The Applicant will continue to engage with Network Rail regarding the interface between those works and the cable route. However, the Scheme does not rely upon any current or future Network Rail works to prevent an increase in flood risk, because the Scheme itself will not increase or redirect surface water runoff towards the railway drainage system. The Applicant has considered the ExA's request to identify opportunities to reduce the causes and impacts of flooding at Farleaze Farm. No Scheme-

ExQ	Respondent	Question	Applicant's Response
			related measure has been identified because the Scheme will not contribute to the existing flooding issue. Any alteration to the culvert or wider railway drainage arrangements would concern third-party infrastructure outside the Applicant's control and would require consideration by Network Rail and the affected landowner. The Applicant therefore concludes that the Scheme will not increase flood risk to Farleaze Farm and that no additional mitigation as part of the Scheme is required.
FHW2.12	The Applicant	**Thermal Implications of Cables on Groundwater** The EA asks in [REP4-097] (issue EA-030) for clarification about how micro-routing will ensure that no cables are within Source Protection Zone 1 and springs. They required the applicant to adhere to the advice note that they sent in February 2026 and provide more detail to demonstrate that the cables will not interact with these sensitive receptors. This should include depth to groundwater and anticipated ground conditions in sensitive groundwater areas.	The Applicant can confirm that the guidance provided by the EA has been noted and is now referenced in **6.1 ES Volume 1 Chapter 19 Ground Conditions [REP3-024]** (see section 19.11.10). The applicant will adhere to this guidance in undertaking more detailed assessment of the risk associated with thermal loss from cables. Detailed assessments of thermal impacts from cables will be made once location-specific hydrogeological data is available from ground investigation to be completed prior to the construction phase. The applicant clarifies that "micro-routing" of cables is intended to include both horizontal and vertical routing within the ground, dependent on where groundwater

ExQ	Respondent	Question	Applicant's Response
		The applicant is to provide a response to this and include any changes needed to the environmental management plans or ES documents.	is encountered during ground investigation. This will be included as an update at Deadline 5.
FHW2.13	The Applicant The Lead Local Flood Authority	**Ordinary Watercourse Consent and Environmental Permitting** The ExA in EXQ1 FHW1.19 requested the views of the LLFA regarding Articles 6 and 17 and Schedule 15, Part 9 provisions of the dDCO in relation to ordinary watercourse consent and environmental permitting. The LLFA provided a response [REP3-142] asking for amendments to Article 17 to make clear that, where the relevant watercourse, public sewer or drain falls within the drainage-authority regime, Part 9 governs the approval process instead of the generic Article 17(3) and (4) mechanism. That would avoid parallel approval regimes following DCOs already consented for other solar schemes. The applicant's response [REP4-081] was to reject the proposed changes to Part 9 provisions and accept the proposed changes to Article 17. The applicant added the LLFA proposed wording as 17(4) of the dDCO [REP4-004] to read:	The Applicant is continuing to engage with the Lead Local Flood Authority in regard to the Statement of Common Ground. Any additional issues emerging through the examination will be added and responded to by each party where necessary.

ExQ	Respondent	Question	Applicant's Response
		Where the undertaker discharges water into, or makes any opening into, a watercourse, public sewer or drain belonging to or under the control of a drainage authority, the provisions of Part 9 of Schedule 15 (protective provisions) apply in substitution for the provisions of paragraphs (3) and (4). The SoCG between the applicant and Wiltshire Council [REP4-061] does not include reference to these issues so both parties are requested to provide an update on this issue and consider if it should be included in the SoCG.	

2.10 General and Cross Topic Questions

Table 2-10 General and Cross Topic Questions

ExQ	Respondent	Question	Applicant's Response
GCT2.1	The Applicant	**Construction Timescale** The applicant detailed a 24-month timescale for the delivery of the project [APP-265]. Given the applicant's approach to ecology where it details making use of licensing/ permitting arrangements, the applicant is asked to confirm whether the time taken to acquire these licenses has been considered in the construction timetable. When answering this question, the applicant is asked to consider their answer to ExQ2 EB2.14 regarding seasonal workings. In considering the approach to ecology, if delays would be incurred due to the need to seek licenses and avoid species seasonal sensitivities, then the applicant is requested to provide an updated construction timetable along with commentary on whether a longer construction period has any ramifications for any other part of the environmental assessment or temporary possession of land.	The Applicant can confirm that the potential need to obtain protected species licences and to programme certain activities to avoid seasonal ecological sensitivities has been taken into account in the development of the indicative construction programme. It is acknowledged that, as with any development project where protected species and other wildlife are present, unforeseen ecological constraints or licensing requirements may arise during construction. The ecological approach for the Scheme is founded on the mitigation hierarchy, with avoidance, micrositing and the timing of works prioritised such that the need for protected species licences is minimised wherever practicable, with licensing relied upon only as a last resort. Where licences are required, these would be obtained in advance of the relevant works in accordance with the normal construction planning process. The Applicant does not consider that ecological constraints would result in delays to the overall construction programme. Whilst ecological

ExQ	Respondent	Question	Applicant's Response
			considerations may influence the timing of works within specific, localised areas (for example, where works must await licence approval or be undertaken outside sensitive periods), these constraints would affect only discrete work fronts rather than the Scheme as a whole. Construction activities would continue concurrently in other areas of the Order Limits, and the programme has sufficient flexibility to accommodate such sequencing. Accordingly, the Applicant does not consider that an updated construction timetable is required. The anticipated construction period remains unchanged and, therefore, there are no consequential implications for the environmental assessment or the duration of temporary possession of land arising from the ecological approach.
GCT2.2	The Applicant	**Community Orchard** In the applicant's response to ExQ1 LSF1.18 [REP3-128] it was advised that discussions around the community orchard were ongoing. The applicant is requested to provide an update to these discussions and advise what will happen to the area marked for the community	For the purposes of the Examination, the Applicant confirms that the indicative location for a community orchard is being discounted and the land in Field C25 will be utilised solely for its primary purpose as Proposed Ground Nesting Bird Mitigation, as identified on **ES Volume 2, Figure 3-4-3.1 to 3-4-3.2 Landscape and Ecology Mitigation Plan [EN010168/APP/6.20** (Revision 3 and 4).

ExQ	Respondent	Question	Applicant's Response
		orchard should no agreement be reached during the examination. In considering your response to the above, please also provide justification for the inclusion of this land within the Order limits given the use appears to be speculative, particularly having regard to the compulsory acquisition guidance that the land to be acquired is no more than is reasonably required for the purposes of the development.	This ensures that the area functions solely as a dedicated, habitat parcel and the land is therefore necessary to facilitate the development. The Applicant will continue to consider suitable opportunities to fund or implement a community orchard via the Community Benefit Fund. The Applicant therefore maintains that the Order Limits encompass only the land reasonably required to deliver the Scheme and its environmental commitments, satisfying the requirements of Section 122 of the Planning Act 2008.
GCT2.3	The Applicant	**Change Request** In the applicant's change request covering letter, 'Change 3' is described as an *update to the Works Plans to allow more flexibility in the detailed design of the interconnecting cable alignment* [CR1-001]. It is understood that this additional flexibility to the site cabling across a wider area could have implications for public rights of way (PRoW), drainage, ecology, soil damage which have not been assessed. The applicant is requested to provide a summary of the implications of this change and	The Change Application was accompanied by a **Supporting Environmental Information Report [CR1-046]** that sought to assess the proposed changes to the Scheme and document any alterations to the content and conclusions of the Environmental Statement and associated documents. The proposed changes were considered by the topics that were included in the ES (including Socio-Economics, Tourism and Recreation, Hydrology, Flood Risk and Drainage, Ecology and Biodiveristy and Soils and Agriculture) and the assessment findings are set out in Section 1.8 to Section 1.23 of

ExQ	Respondent	Question	Applicant's Response
		how it has assessed the potential impacts resulting from 'Change 3'.	the **Supporting Environmental Information Report [CR1-046]**. With respect to public rights of way (PRoWs), the Applicant has already considered that Change 3 would not have a material effect on the assessment of effects to PRoWs as set out in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and in the supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This was reported at paragraphs 1.18.4-1.18.5 in the **Supporting Environmental Information Report [CR1-046]**. This is because the assessment as submitted to support the DCO application already considered the worst-case impact of 11 kV cable laying across all areas that were designated Work No.1(d). For PRoWs, this meant the possibility of temporary closures or diversions to facilitate cable laying during the construction period at any location on a PRoW falling within that work package area. Whilst Change 3 updates this works package to Work No.5(b) across parts of the Scheme, this does not change the type or worst-case duration of effect likely to be experienced on PRoWs. Whilst cable

ExQ	Respondent	Question	Applicant's Response
			trenching may be physically larger or take longer to install due to the higher voltage (33 kV) cabling, or inclusion of multiple circuits in some locations, this does not alter the worst-case need for potential temporary closures or diversions to any affected PRoWs during construction to facilitate their installation. Mitigation measures to control impacts to PRoWs remain unchanged as secured through the **Outline Public Right of Way and Permissive Paths Management Plan [REP1-104]** by Requirement 16 of Schedule 2 to the **Draft DCO [REP4-004]**. With respect to ecology, the Applicant has already considered that Change 3 would not have a material effect on the assessment of effects presented in **ES Chapter Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]**. This is because the ecological assessment has been undertaken on a precautionary basis, assuming that construction activities could occur anywhere within Work Number 1 and Work Number 5B applying a worst-case assessment of potential habitat loss, protected species impacts and disturbance. The Applicant considers the additional flexibility introduced through Change 3 does not increase the maximum extent of working areas or introduce new construction

ExQ	Respondent	Question	Applicant's Response
			activities with different or greater potential impacts on ecological features than already assessed in **ES Chapter Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** as set out in Paragraph 1.11.4 in the **Supporting Environmental Information Report [CR1-046]**. The likely effects on soil resources set out in **ES Volume 1 Chapter 17 Soils and Agriculture [REP3-021]**, are determined according to soil type and soil characteristics rather than by location. The best practice principles for managing soils set out in the **Outline SRMP [REP4-053]** also apply to all soil types regardless of location. The potential impacts and subsequent mitigation measures for soil resources are unchanged in light of additional flexibility on cable alignment. With respect to hydrology, flood risk and drainage, Change 3 does not alter the nature of the potential effects assessed for the interconnecting cables. The cables would remain subsurface infrastructure and would not create permanent impermeable areas or operational surface water drainage requirements. The potential effects would remain temporary and associated principally with trenching, soil disturbance, dewatering, temporary obstruction of

ExQ	Respondent	Question	Applicant's Response
			drainage pathways and crossings of watercourses or existing land drains. The final cable alignment will be informed by pre-construction surveys and detailed design to identify and, where practicable, avoid watercourses, drainage features and established overland flow routes. Where crossings are required, the crossing methods and mitigation set out in **ES Volume 3, Appendix 3-2 Cable Route Construction Method Statement [REP4-039]**, the **ES Volume 3 Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor [REP3-063],** and the **Water Framework Directive Assessment [REP1-094]** will continue to apply. Temporary drainage, dewatering, sediment control, protection of existing drainage features and reinstatement will be secured through the Water Management Plan forming part of the detailed CEMP, prepared substantially in accordance with the **Outline Construction Environmental Management Plan [REP4-049]**. The additional alignment flexibility therefore does not give rise to any new or materially different hydrology, flood risk or drainage effects, and the

ExQ	Respondent	Question	Applicant's Response
			assessment conclusions and mitigation measures remain unchanged.
GCT2.4	The Applicant	**Re-powering** Regarding the current policy direction of travel and the need for renewables going forward, on what basis should the ExA consider the proposed development to be 'temporary'? Whilst there is a decommissioning date (60 years) written into Requirement 20 of the dDCO, what is to stop the proposed development being re-powered? In such circumstances, would not the label of 'temporary' be misplaced in all ES assessments?	The Applicant considers that the Scheme is properly described and assessed as a temporary development in a planning and consenting sense. That is consistent with recent decisions from the Secretary of State, including One Earth Solar Farm where a 60-year duration was considered "*long-term but temporary*". The **draft DCO [REP4-004]** authorises the operation of a generating station for a finite period of up to 60 years from the date of final commissioning (when it creates electricity on a commercial basis). This is secured by Requirement 20 of the **draft DCO [REP4-004]**. Nothing in the **draft DCO [REP4-004]** would grant consent for the Scheme to operate beyond the 60-year period. Furthermore, the Applicant does not consider that the identified need for low-carbon generation under National policy converts the Scheme's individual consent into a permanent or indefinite operational period. While policy establishes the need for additional low carbon generation and weight to be afforded to its

ExQ	Respondent	Question	Applicant's Response
			benefits (as Critical National Priority infrastructure), it does not remove the need for each development, including any future proposal to extend, replace or repower an existing development, to be authorised through the applicable planning regime at the time. Finally, the scheduled replacement of solar panels and battery units during the operational life has been explicitly assessed within the Environmental Statement to ensure a "worst-case" scenario for traffic and lifecycle greenhouse gas emissions is captured. The ability to re-power or replace equipment is controlled by Article 5 of the **draft DCO [REP4-004]** which prohibits any activities that would give rise to materially new or materially different environmental effects than those reported in the Environmental Statement.
GCT2.5	The Applicant	**Mitigation Route Map** In response to ExQ1 GCT1.6 [REP3-128] the applicant stated that it would prepare a mitigation route map and submit this at a future deadline. The ExA requests that the first iteration of this document is submitted at deadline 5 and no later, so that there is reasonable opportunity for it to be reviewed, tweaked and updated as necessary at	The Applicant has submitted a **Mitigation Route Map [EN010168/EXAM/9.59]** at Deadline 5. The Applicant does not consider it appropriate for the Mitigation Route Map to be a separately certified document, given its purpose is to identify how the various mitigation mechanisms within the DCO are already secured.

ExQ	Respondent	Question	Applicant's Response
		subsequent deadlines, and for the final version to be included as a certified document in the dDCO.	
GCT2.6	The Applicant Wiltshire Council	**Outline Operational Environmental Management Plan (oOEMP)** At ISH4, around the discussion of the definition of 'maintain' in the dDCO, the applicant was asked about whether reporting mechanisms should be included within the oOEMP for when the anticipated wholesale replacement of the BESS units and solar PV panels take place; this is so that in 10 or so years' time when the BESS units are being replaced, or 30 to 40 years' time when the panels are being replaced, the local planning authority is notified. Taking this slightly further, the ExA considers that there may be some merit in a reporting mechanism for when 10% or more of those components are replaced at any one time (noting that malfunctioning or damage could occur well in advance of anticipated wholesale replacement timescales). The applicant at ISH4 stated that it would be open to adding something into the oOEMP regarding a reporting mechanism, but nothing was included	The Applicant is in agreement with the merits of incorporating a reporting mechanism within the **Outline Operational Environmental Management Plan (OEMP) [REP4-051]** to notify Wiltshire Council of significant replacement activities. As discussed at Issue Specific Hearing 4 (ISH4), the Applicant recognises that while routine maintenance is low impact and would not necessitate any formal communication, the wholesale replacement of solar PV panels and BESS units represents a phase of activity involving increased logistics and site personnel, all of which have assessed as a "peak replacement scenario" within the Environmental Statement. In addition, the Applicant specifically acknowledges that the replacement of a smaller than wholesale number of BESS units would be more noticeable to the local community given the scale of the equipment and the specific HGV requirements for transporting these units. While panels are not anticipated to be replaced in a way that would not fall under either routine maintenance,

ExQ	Respondent	Question	Applicant's Response
		in Revision 5 of the oOEMP [REP4-051]. The ExA considers that reporting mechanisms for replacement activities (excluding routine maintenance) can help local planning authorities to deal with queries from local communities when more than routine maintenance is occurring on the sites and communities are in the dark about what is taking place on the sites. The applicant and Wilshire Council are therefore requested to consider what form of drafting could capture a reporting mechanism in the oOEMP for the wholesale replacement period of the BESS units and solar PV panels, and whether further reporting terms should be added for a much smaller replacement exercise (e.g. 10% of the components) but excluding routine maintenance.	or under the assessed wholesale replacement, including in a phased manner, the Applicant concludes that a commitment to notify the local authority of any replacement of 10% or more of either the BESS units or solar PV panels should be captured.

2.11 Habitats Regulations Assessment

Table 2-11 Habitats Regulations Assessment

ExQ	Respondent	Question	Applicant's Response
HRA2.1	Natural England	**Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC)** Considering Wiltshire Council's ongoing concerns [REP4-061] that targeted bat activity surveys should have been undertaken within the CRC, can Natural England confirm: 1. That it is satisfied that the current survey information provides sufficient evidence to assess the effects of the CRC works on Annex II bat species associated with the Bath and Bradford-on-Avon Bats SAC? 2. Whether targeted bat activity surveys within the CRC would be likely to have materially influenced the conclusions of the HRA?	The Applicant notes that these questions are directed to Natural England. However, the Applicant's position is that targeted bat activity surveys undertaken across the CRC at the pre-application stage are not considered to have materially altered the conclusions of the Habitats Regulations Assessment, given the conservative worst-case assumptions made. Such surveys may have provided additional information on the relative level or spatial distribution of bat activity within particular parts of the CRC. However, given that the assessment already assumes the presence and use of suitable habitat by Annex II bat species, additional survey information would most likely have identified areas of lower activity or importance and could therefore have supported a reduction or refinement of the avoidance and mitigation measures currently proposed. Conversely, any confirmation of higher levels of activity at particular locations would have been

ExQ	Respondent	Question	Applicant's Response
			addressed through the same secured process of detailed design, micrositing, control of lighting and, where necessary, location-specific mitigation. Accordingly, targeted activity surveys would not be expected to identify a materially different impact pathway or alter the conclusion that, with the secured measures in place, the CRC works would not adversely affect the integrity of the Bath and Bradford-on-Avon Bats SAC.

2.12 Health and Wellbeing

Table 2-12 Health and Wellbeing

ExQ	Respondent	Question	Applicant's Response
HW2.1	The Applicant Wiltshire Council Stop Lime Down	**Mental Wellbeing** Stop Lime Down, in its comments on the applicant's responses to ExQ1 HW1.1 and HW1.3 [REP4-132], expressed concern that the applicant had not adequately addressed the potential mental health impacts associated with the proposed development. It requested further information on a communications strategy demonstrating how the recommendations contained within Suffolk County Council's *Energy and Climate Adaptive Infrastructure Policy: Community Engagement and Wellbeing Supplementary Guidance Document* (SGD) have been considered and incorporated into the applicant's approach. The ExA acknowledges the sensitivity of this matter and recognises the efforts made by the applicant to engage with mental health providers within and around the Order limits to mitigate potential mental health impacts.	**Part 2)** The responsibility for development of the Stakeholder Communication Plan (as secured through the **Outline Construction Environmental Management Plan [REP4-049]** by Requirement 13 in Schedule 2 to the **Draft DCO [REP4-004]**) would fall to the Applicant, while the Community Liaison Group would act as a consulting and delivery partner. As part of discharging the detailed CEMP, Wiltshire Council would be approving this plan under Requirement 13. As the Applicant has previously noted, the Suffolk County Council guidance principles relate to pre-submission engagement, but the Applicant is not opposed to principles that are post-consent appropriate from being incorporated into the draft Terms of

ExQ	Respondent	Question	Applicant's Response
		Nevertheless, the ExA considers that the SGD contains guidance of relevance to the post-consent phase and that its recommendations could usefully inform the development of a clear and structured communications strategy. This may have implications for the applicant's response to ExQ SE2.9, particularly in relation to the proposed role and function of the Community Liaison Group (CLG). <u>Wiltshire Council and Stop Lime Down:</u> In its response to ExQ1 HW1.1, the applicant questioned the appropriateness of relying on the SGD on the basis that it is not specifically directed at the post-consent stage. The applicant requested that Wiltshire Council identify those elements of the SGD it considers most relevant to the development of a communications strategy. 1. Wiltshire Council and Stop Lime Down are therefore invited to identify the specific recommendations or principles within the SGD that they consider applicable to the post-consent phase and explain how these should be	Reference for the CLG. The Applicant provided an example of Terms of Reference to Wiltshire Council on the 4th of August 2026 that it anticipates could be used as the base document for Lime Down, and awaits comments on this. The Applicant notes that the ExA has requested that Wiltshire Council propose which elements of the Suffolk County Council Guidance it considers should be incorporated into the Terms of Reference. The Applicant considers the Community Liaison Manager would act as an intermediary to ensure the Stakeholder Communication Plan is executed suitably and monitored accordingly. The Community Liaison Group (CLG) will function as an information giving forum where emerging decisions and timelines for construction and design are shared transparently to reduce local community anxieties.

ExQ	Respondent	Question	Applicant's Response
		reflected within a communications strategy for Lime Down. Responses should also clarify their expectations regarding the purpose, scope and delivery of that strategy. <u>The Applicant, Wiltshire Council and Stop Lime Down:</u> Having regard to Stop Lime Down's deadline 4 submission [REP4-132], the ExA invites comments on how a communications strategy informed by the SGD could be secured, implemented and monitored. In particular: 2. Should responsibility for overseeing or supporting delivery of the communications strategy form part of the CLG's role? If so, how could this be achieved in practice? 3. How might such arrangements avoid placing additional burdens on volunteer representatives and Parish Councils?	Under the direction of the agreed Stakeholder Communication Plan once approved, the CLG members would thereafter act as communication touchpoints for relevant stakeholders within the communities, businesses or service providers they represent to ensure wider stakeholder feedback or recommendations for the Scheme can be channelled back to the Applicant's team. This role within the CLG would include signposting to locally available mental health and wellbeing resources to members of the public who require them, using information and materials provided by Wiltshire Council's Public Health Team. **Part 3)** The Applicant considers that the arrangements described in Part 2) above demonstrate that the delivery of the Stakeholder Communication Plan

ExQ	Respondent	Question	Applicant's Response
		4. What mechanisms, if any, would be appropriate to secure implementation and monitoring of the strategy throughout the post-consent phase? In responding, parties should also have regard to ExQ2 SE2.9. Wiltshire Council and Stop Lime Down are welcome to provide comments on that question where relevant.	would fall within the remit of the Community Liaison Group. The Applicant proposes that the production of the Stakeholder Communication Plan be a priority task for the CLG following its establishment post-consent. The Applicant and Community Liaison Manager would act as administrators, drafting the Stakeholder Communication Plan, and then being in charge of collating and implementing community and stakeholder feedback and recommendations, or feeding back where measures cannot be implemented as suggested. The Applicant considers this is a suitable way to ensure the scope of responsibility for community members of the Community Liaison Group is well-defined and limited so as not to overburden the group's participants. **Part 4)**

ExQ	Respondent	Question	Applicant's Response
			Implementation and monitoring of the Stakeholder Communication Plan is secured through the following mechanisms: • The terms of reference for the Community Liaison Group as secured through Requirement 4 of Schedule 2 to the **Draft DCO [REP4-004]**; • The approval of the detailed Construction Environmental Management Plan (substantially in accordance with the certified **Outline CEMP [REP4-049]**) pursuant to Requirement 13 of Schedule 2 to the **Draft DCO [REP4-004].** This means that Wiltshire Council, as the designated discharging authority, can ensure that the strategy meets the necessary standards for community wellbeing before approval.

ExQ	Respondent	Question	Applicant's Response
			Accountability is further ensured through the commitment to providing a designated community contact throughout the up to 60-year operational life of the Scheme, with a dedicated Community Liaison Manager reinstated during replacement activities and decommissioning. The Applicant will continue discussions on the most suitable delivery mechanism for monitoring of the Stakeholder Communication Plan with Wiltshire Council, and will report updated discussion through written representations or through agreement of the **Statement of Common Ground with Wiltshire Council [REP2-025]**. The Applicant and Wiltshire Council have also agreed that a s106 agreement for post-consent monitoring costs will be entered into and the Applicant is

ExQ	Respondent	Question	Applicant's Response
			currently preparing a draft agreement. In addition, a post-consent Planning Performance Agreement will be entered into in order to cover Wiltshire Council's costs incurred during the discharge of the requirement process.

2.13 Landscape and Visual

Table 2-13 Landscape and Visual

ExQ	Respondent	Question	Applicant's Response
Cotswolds National Landscape			
LV2.1	The Applicant Wilshire Council Natural England Cotswolds National Landscape Board (CNLB)	**Time Limited Enhancements** The applicant's stated in its response to ExQ1 LSF1.1 [REP3-128] that there are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The creation of wildflower meadows within fields A1, C1, C6, C8, C9 and B12 and the creation of wildflower meadow verges in A11, A12 and C10 are relied on by the applicant as beneficial effects to further the purposes of the Cotswolds National Landscape (CNL). The ExA understands that these enhancement measures are therefore time limited and removed at decommissioning. <u>The Applicant:</u>	1. At decommissioning other than the buried cabling, all infrastructure would be removed with agricultural fields returned to agriculture. The reinforced landscape however would be retained as there is an expectation that at Year 60 that there would be an equivalent of current countryside policies in place to ensure the protection of hedgerows, woodland, trees etc. 2. The Applicants position is that for the extent of the development, the enhancement measures would seek to further the purposes of the CNL. The measures identified by the CNLB as 'furthering the purposes' and as set out in the ExAs question are dependent upon the continuation of the development – these elements, unlike the trees, scrub and hedgerows would be removed at decommissioning. The Applicant cannot control what is done with these elements on decommissioning of the Scheme and return of the land to the original landowner. It would be open to the landowner to retain them, depending on what their role

ExQ	Respondent	Question	Applicant's Response
		1. The applicant is asked to confirm if the ExA's understanding is correct. <u>The Applicant, Wiltshire Council, Natural England and the CNLB:</u> 2. The parties are asked to comment on whether a time limited enhancement can be relied on to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under section (s) 85 of the Countryside and Rights of Way Act 2000 (as amended) (CRoW Act)? 3. If enhancements are removed at decommissioning, would that then be considered a harm to the purposes of the Cotswolds National Landscape at decommissioning?	in furthering the purpose of the CNL would be in the absence of the Scheme. 3. The Applicant considers that rather than this bringing 'harm' to the purposes of the CNL, that the removal of these enhancements would constitute a return to the baseline position. However, the CNLB stated in its D3 submission **[REP3-154]**, that: *"post decommissioning, following the removal of all introduced above ground energy infrastructure components and restoration of the land back to farming land use or alternative appropriate agrienvironment use(s), there could be slight positive impact for landscape character if the embedded character supporting mitigation and planting enhancement measures are retained at the end of decommissioning phases as a positive landscape legacy of the project."* It is expected that there would be agri-environmental schemes in place to support the land management of the new habitats such as grassland meadows and their associated species, as this is a priority for the CNL as set out in the Management Plan.
LV2.2	Natural England	**Furthering the Purposes of the Cotswolds National Landscape** The ExA notes that the SoCG between the applicant and Natural England [REP4-	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		063] states Natural England's position that the enhancement measures detailed in the applicant's Assessment of Effects on the CNL and its Special Qualities [APP-197] aid in demonstrating that the scheme will further the purposes of the National Landscape. Further to question LV2.1 above regarding the consideration of time limited enhancements, do Natural England consider that the proposed development demonstrates that enough has been done to fulfil the duty to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under s85 of the CRoW Act?	
LV2.3	Wiltshire Council	**Issue Specific Hearing 2, Action Point 13** The ExA notes that Wiltshire Council responded to Action Point 13 of ISH2 [REP4-093] to state that it considers that the CNLB to be the party which is best placed to provide details of cases which support its position on how the duty to	The Applicant considers that as the CNLB and Natural England are the Statutory Bodies responsible for the CNL, that they are best placed to determine how the duty to further the purposes of the CNL under s85 of the CRoW Act should be applied.

ExQ	Respondent	Question	Applicant's Response
		further the purposes of the CNL under s85 of the CRoW Act should be applied. It is the ExA's understanding from ISH2, that Wiltshire Council's position was that the duty to seek to further the purposes of the CNL under s85 of the CRoW Act would not be fulfilled by the proposed development. On the Other hand, the CNLB state in its D3 submission [REP3-154] that it considers the applicant has sought to further the natural beauty of the CNL through the proposed enhancement measures located in its setting. Wiltshire council is asked to confirm if it is now in agreement with the CNLB's position regarding the duty under s85 of the CRoW Act? If not, it is asked to respond to action point 13 from ISH2.	
LV2.4	Cotswolds National Landscape Board	**Matters Raised at Issue Specific Hearing 2** The ExA understands that as a result of action point 8 from ISH2 [EV8-010], a meeting was held between the applicant	1. The Applicant has set out their understanding of the extent of the setting of the CNL within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the**

ExQ	Respondent	Question	Applicant's Response
		and CNLB on 13 July 2026. The CNLB are asked to confirm if there is agreement with the applicant in relation to: 1. The extent of the setting of the CNL as set out in the applicant's response to ExQ1 LV1.9 [REP3-128] (Annex E). 2. The proposed layout of panels in field A1 as shown in the Works Plans [REP3-004]. 3. Whether there is sufficient information in the control documents to mitigate impacts to the dark skies special quality of the CNL.	**Examining Authority's First Written Questions [REP3-128].** 2. The Applicant raised this issue directly with the CNLB during the 12 July 2026 meeting and are awaiting confirmation from the CNLB on their position of the layout of panels within field A1. 3. Section 3.4 of the **Outline Operational Environmental Management Plan (Rev 5) (OEMP) [REP4-051]**, and paragraph 8.7.62 of **ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]** confirms that permanent lighting is not required within the Solar PV Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS Area, to be used only for maintenance and security purposes. A sensitive lighting strategy as part of the detailed OEMP will specify how this artificial lighting will be installed and used. Night time lighting will be required for some maintenance activities for the Solar PV Sites. As stated within paragraph 2.7.2 of the **Outline OEMP [REP4-051]**, all routine maintenance activities, except panel cleaning, would be scheduled for daylight hours as far as practicable. Therefore, it is anticipated that focussed task specific lighting would only

ExQ	Respondent	Question	Applicant's Response
			be required in the event of emergency works/ equipment failure requiring night-time working or panel cleaning operations. Paragraph 2.7.1 of the **Outline OEMP [REP4-051]**, notes that this level of lighting is similar to lighting required for night-time agricultural activities carried out in the area. Lighting controls are secured through the relevant management plans. Construction lighting is controlled by section 2.6 of the **Outline Construction Environmental Management Plan (CEMP) [REP4-049]**. Operational lighting is controlled by section 2.7 of the **Outline OEMP [REP4-051]**. As lighting is controlled by the **Outline OEMP [REP4-051]**, rather than the **Design Principles and Parameters [REP4-043]**, the Applicant has updated the **Outline OEMP [REP4-051]** to explicitly state that no fixed lighting installations would be installed in the Solar PV Sites.
LV2.5	Natural England	**Setting of the Cotswolds National Landscape** Natural England is asked if it agrees with the applicant's response to ExQ1 LV1.9 [REP3-128] (Annex E) where it defined the setting of the Cotswolds National Landscape in spatial terms? If not, Natural	The Applicant considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The Applicants position is that the setting for the CNL extends as far as to where development or land management proposals, can be considered to have an impact upon the CNL.

ExQ	Respondent	Question	Applicant's Response
		England is asked to define in spatial terms the extent of the area outside of the boundary of the National Landscape that it considers forms its setting?	The Applicant has set out their understanding of the extent of the setting of the CNL within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**.
LV2.6	Natural England	**Effects to the Cotswolds National Landscape and its Special Qualities** The ExA notes that the SoCG between the applicant and Natural England [REP4-063] states Natural England's position that the proposed development is unlikely to result in significant adverse impacts to the CNL when considered alone. Natural England's attention is drawn to the submissions from the CNLB at D3 [REP3-153 and REP3-154] in which the CNLB concludes that the proposed development would have a net adverse effect on the special qualities of the National Landscape. 1. Natural England is asked to comment on whether it agrees with the CNLB's position or the	1. The Applicants position on the effects on the Special Qualities of the CNL is set out within **ES Volume 3 Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [APP-197]** which concludes that the landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process and has been informed by the Cotswold Nature Recovery Plan in conjunction with liaison with the project Ecologist and consultation with officers at the CNL and WC. The Scheme has avoided harm to the CNL, maintained views to and from the CNL, protected the features of the landscape within the setting of the CNL, retained and enhanced the character of the landscape through the proposed embedded mitigation and provided positive enhancements to further the purpose of the CNL. 2. The Cumulative Assessment within **ES Volume 1, Chapter 8: Landscape and Visual [REP3-026]** was

ExQ	Respondent	Question	Applicant's Response
		applicant's position on the special qualities of the CNL? 2. Natural England is also asked to confirm if it considers that the applicant has demonstrated that there would not be cumulative effects on the National Landscape that would increase effects identified when considering the project alone?	carried out on a 10km Cumulative Study Area as shown on **ES Volume 2, Figure 8-15: Cumulative ZTV and Cumulative Study Area (Figure 8-15 Series) [APP-106]**. This Study Area encompasses a large area of the Cotswolds National Landscape (CNL) and there are no inter project cumulative Sites within the CNL. 3. Castle Coombe Circuit Solar Farm is an existing Solar Farm within the CNL located approximately 6km from the nearest Lime Down Solar Site. Within the 10km Cumulative Study Area, Castle Coombe Solar Farm is the only existing Solar Farm within the CNL. As this is an existing development, it has been considered within the baseline assessment rather than the Cumulative Assessment. Following a meeting with Natural England on 18th February 2026, it was agreed that existing solar farms have been correctly considered as part of the baseline assessment. It was agreed that there are no cumulative effects on the CNL itself, noting that the Lime Down Scheme is not within the CNL.
LV2.7	The Applicant	**Linear Tree Planting in the Setting of the Cotswolds National Landscape**	The Scheme offers significant opportunities for tree and hedgerow planting, as well as strengthening of existing hedgerows. Linear Tree Planting is intended to strengthen

ExQ	Respondent	Question	Applicant's Response
		The figures showing the enhancement within the setting of the CNL in Annex C of the applicant's response to ExQ1 LV1.1 [REP3-128] show proposed linear tree planting to the boundary of the CNL with fields C8, C6 and C1. Is this correct considering that hedgerows are proposed to be kept at existing heights in this location in order to preserve the character of the setting of the National Landscape?	existing hedgerows and reinforce field boundaries and would include the planting of Select Standard trees. The Local Nature Recovery Strategy for Wiltshire and Swindon encourages increasing the number of trees within hedgerows as well as allowing existing hedgerows to grow taller and wider. To contribute to climate change mitigation the CNL Management Plan 2025 – 2030 (Page 60) promotes increasing canopy cover outside of woodlands by planting new trees or by natural regeneration through increased wood pasture, hedgerows and hedgerow trees. The Outline LEMP does not specify the density required for Linear Tree Planting alongside existing hedgerows, allowing this to be determined within detailed design (subject to consent) and in consultation with the CNLB and WC. However, new hedgerow and linear tree planting, together with the management of existing hedgerows, will aim to promote standard hedgerow trees at an average density of at least one tree every 20 m to allow for irregular spacing which complements the existing landscape character The presence of trees at this density is not expected to compromise the open views along the boundaries of C1, C6 and C8 and will support the landscape character of their setting. The

ExQ	Respondent	Question	Applicant's Response
			remaining shrubby element of the hedgerows will be maintained at existing heights. This management target is also in accordance with the Cotswolds Nature Recovery Plan, which promotes hedgerow trees for the benefit of biodiversity..
Design and Parameters			
LV2.8	The Applicant	**Battery Energy Storage System Parameters** The Works Plans [REP3-004] appear to allow BESS development to extend close to the southern boundary of field D1 whereas the Landscape and Ecology Mitigation Plans [REP3-037] and the Landscape and Visual Impact Assessment Methodology [REP1A-006] (pdf page 64) do not show the BESS occupying the entirety of field D1 to allow for a proposed bund with scrub and tree planting and a proposed block of native woodland. 1. Do the Works Plans allow more flexibility in the size and location of the BESS than has been assessed for LVIA?	The Applicant confirms that the maximum area for the BESS compound will be 5.5ha in size as per Table 2-2 of the **Design Principles and Parameters [REP4-043]** document. This is the maximum parameter which has been assessed throughout the ES. Whilst a slightly larger area is shown as Works Number 2 'Energy Storage Facility' on the **Works Plans [REP3-004]** this is simply to allow for appropriate micrositing of the BESS to take place at detailed design, for example if unexpected ground conditions were encountered. The **Landscape and Ecology Plan for Site D [REP3-037]** correctly shows the maximum parameter area in the location which is currently deemed the most likely for the BESS to be sited, however, as stated above, this is subject to minor adjustments at detailed design. The Applicant does not consider it appropriate for the **Works Plans [REP3-004]** to differentiate between Works Number 2 and Works number 6 further than is already provided in the Works Plan. Works Number 6 ' General works including fencing, landscaping, accesses and drainage' already

ExQ	Respondent	Question	Applicant's Response
		2. Should the Works Plans differentiate between the BESS itself and vegetation screening to reflect the model used in the photomontages?	overlaps the entirety of the BESS area as well as extending slightly beyond which would allow for the respective screening shown in the **Landscape and Ecology Plan for Site D [REP3-037]** to be applied regardless of any micrositing which is applied at detailed design.
LV2.9	The Applicant Wilshire Council	**Independent Design Review** The applicant states in the Design Approach Document [APP-268] (Table A-1) that an independent design review is not necessary because the design team are very experienced. An experienced design team does not offer the same benefit to design development that an independent review can have. Given that there are a number of areas where flexibility is still required at this stage, should a design review post DCO consent and prior to the approval of detailed design be secured to include the following components of the proposed development? • The proposed solar photovoltaic technology (Work No. 1 (a)) • The layout of:	The Applicant maintains that the existing framework of the DCO provides the necessary independent oversight suggested, which means a further separate design review process unnecessary. **The Design Principles and Parameters [REP4-043]** and the **Design Approach Document [APP-268]** establish the envelope within which the Scheme must be delivered. Under Requirement 5 of the **draft DCO [REP4-004]**, the detailed design for all major components including the BESS, and solar technology must be submitted to and approved by the Local Planning Authority/ Wiltshire Council alongside secured final approval from statutory bodies including the EA. This process ensures that the final design is subject to independent scrutiny by the LPA and any outsourced advisors it requires, costs for which could be covered through ongoing PPA arrangements between the parties. Should there be any disputes between the Applicant and Wiltshire Council regarding detailed design, the Schedule 16 process would then be engaged to resolve those disputes. That process would facilitate further independent

ExQ	Respondent	Question	Applicant's Response
		○ the energy storage facility (Work No. 2) ○ the onsite substations (Work No. 3) ○ proposed temporary and permanent access points from the public highway (Work No. 8)	input from the Secretary of State to resolve the dispute and an additional layer of scrutiny where required. To further support this, the Applicant is also highly incentivised to undertake informal consultation with the LPA prior to the formal discharge of requirements, as if the Applicant does not provide opportunity for feedback on design evolution there is greater risk of a dispute in the discharge of Requirement 5. This informal phase would include the provision of details regarding the proposed solar PV technology in Work No. 1 (a) of which the technology will be informed by the most efficient modules available at the time of construction, strictly constrained by the maximum parameters. Furthermore, details regarding the layout, design and aesthetics of the BESS & onsite substations (Work No. 2 & 3) would provided prior to their requirement approval stage to be delivered in line with all requirements of the DCO with further sign-off secured for the **Outline Battery Safety Management Plan [REP3-106]** and drainage strategies which require approval by the LPA in consultation with the Fire and Rescue Service and the Environment Agency. Additionally, the **Design Principles and Parameters [REP4-043]** commits to the use of subdued, non-reflective tones, subject to manufacturers specifications, for conversion units,

ExQ	Respondent	Question	Applicant's Response
			BESS containers, control buildings and CCTV and monitoring equipment. This approach will aid absorption of these components within the landscape, with colours to be agreed with the relevant planning authority under Requirement 5 of the **draft DCO [REP4-004]** prior to construction. As part of the discharge of requirement process, the Applicant would undertake informal consultation before submitting applications to discharge requirements, which provides an opportunity for the relevant planning authority to provide feedback on the proposed colours Finally, the proposed temporary and permanent access points from the public highway in Work No. 8 a & b are included in the detailed design of subject to the technical approval of the Highway Authority (Wiltshire Council) and would be provided at an early stage. The timely delivery of the Scheme is essential to national energy security. The Applicant considers that introducing an additional, non-statutory layer of "independent design review" post-consent would duplicate the work of established technical experts and statutory consultees. The Applicant's design team possesses a proven track record in developing NSIP-scale projects, and their expertise is already being transparently tested through this Examination and on other schemes including advanced stages of subsequent legally

ExQ	Respondent	Question	Applicant's Response
			binding discharge processes on consented Schemes, namely West Burton and Cottom Solar Projects.
Glint and Glare			
LV2.10	The Applicant	**Aviation - Badminton Airfield** The applicant predicts [APP-261] that solar reflections with 'potential for temporary after-image' (yellow glare) would occur towards receptors on the visual circuits at Badminton Airfield. However, the effects are considered by the applicant to be operationally accommodatable and therefore not significant. The conclusions of the Pager Power Glint and Glare Study recommend that consultation with Badminton Airfield is undertaken to understand their position. The applicant is asked to set out what consultation has taken place with Badminton Airfield and whether there is agreement that the effects would be operationally accommodatable?	To date, the Applicant has not received any representations, requests for information or requests for engagement from the operator of the local airfield. No specific concerns relating to the Scheme have therefore been raised by the airfield operator. The Applicant has contacted the operator seeking clarification and will update the ExA at deadline 6.

ExQ	Respondent	Question	Applicant's Response
LV2.11	The Applicant Stop Lime Down	**Aviation - Cumulative Green Glare** The Glint and Glare assessment submitted by Stop Lime Down [REP1-178] concludes that the RWY09 approach at Bowldown Farm and the RWY25 approach at Charlton Park each receive sustained cumulative green glare, in excess of 12,000 minutes from multiple contributing arrays. The applicant responded [REP2-039] that under the Sandia method and former Federal Aviation Administration guidance, there is no duration of green glare which is considered unacceptable from an aviation safety perspective, and the applicant therefore does not consider this to be a material cumulative effect. Furthermore, the applicant's Glint and Glare Study [APP-261] states that where solar reflections are of an intensity of 'low potential for temporary after-image' (green glare), mitigation is not required. <u>The Applicant:</u> 1. The applicant is asked to identify and submit extracts of	FAA 2013 interim guidance applied formally only to on-airfield solar developments in the USA (and has since been replaced) but is widely used within glint and glare assessments globally. The guidance states "*To obtain FAA approval to revise an airport layout plan to depict a solar installation and/or a "no objection" to a Notice of Proposed Construction Form 7460-1, the airport sponsor will be required to demonstrate that the proposed solar energy system meets the following standards:* *1. No potential for glint or glare in the existing or planned Airport Traffic Control Tower (ATCT) cab, and* *2. No potential for glare or "low potential for after-image" (shown in green in Figure 1) along the final approach path for any existing landing threshold or future landing thresholds (including any planned interim phases of the landing thresholds) as shown on the current FAA-approved Airport Layout Plan (ALP). The final approach path is defined as two (2) miles from fifty (50) feet above the landing threshold using a standard three (3) degree glidepath.*" This demonstrates an acceptance of glare with 'low potential for temporary after-image' (green glare) with no limits upon duration.

ExQ	Respondent	Question	Applicant's Response
		relevant guidance supporting its position on this matter. Stop Lime Down: Stop Lime Down is asked to respond to the applicant on this and explain the following: 2. What it considers is a correct assessment of the impact significance of the green glare on these approaches? Provide references to relevant guidance and submit this guidance into the examination. 3. Whether it considers that mitigation measures could reduce the impact to an operationally accommodatable level or if the impact is a result of the overall scale, spread and layout of the proposed development?	
LV2.12	The Applicant	**Road and Rail - Guidance** In response to Stop Lime Down's concerns [REP1-178] regarding the	There is no national guidance within the UK setting out a methodology for the assessment of glint and glare. In the absence of this, Pager Power produced its own glint and glare guidance which has been used for over 1,800 Glint and Glare

ExQ	Respondent	Question	Applicant's Response
	Stop Lime Down	duration of yellow glare on road users and train drivers, the applicant [REP2-039] states that intensity of glare towards receptors is not a relevant consideration under Pager Power's glint and glare guidance. Instead, reference is made to a driver's primary field-of-view to determine whether a driver is likely to be looking in the direction of solar reflections. At deadline 4 Stop Lime Down [REP4-132] questioned the use of guidance produced by the authors of the applicant's Glint and Glare Assessment [APP-261]. <u>The Applicant:</u> 1. The applicant is asked to provide justification of its use of Pager Power guidance and confirm if there is any other guidance available that supports its methodology regarding the assessment of the impact on road users and train drivers. 2. The applicant is asked to submit the Pager Power	Assessments within the UK and internationally, including over a dozen solar DCO projects. Pager Power's Glint and Glare guidance was developed utilising consultation with relevant bodies including National Highways and Network Rail, and both bodies have approved solar projects which utilise Pager Power's methodology for the assessment of glint and glare.

ExQ	Respondent	Question	Applicant's Response
		guidance and other relevant guidance supporting its position. <u>Stop Lime Down:</u> 3. Stop lime down are asked if there is guidance supporting the position that the duration and intensity of glare towards road users and train drivers should factor into the assessment of impact on these receptors rather than just the driver's primary field of view? If so, submit the relevant guidance.	
LV2.13	The Applicant	**Software used for Assessment** At deadline 4, Stop Lime Down [REP4-132] raised concerns regarding the independent validation of the software used for the glint and glare assessment. The applicant is asked to explain how the ExA can be satisfied that the results of its assessment can be relied upon to support its conclusions including whether the use of different software could potentially yield significantly different results.	The **ES Volume 3, Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261]** has been conducted using both Pager Power's internal software and Forge Solar's model, and the results of both have been compared and are considered to produce equivalent results. The two models were developed independently but both utilise a geometric model which considers the position of the Sun each minute and determines whether a solar reflection is geometrically possible. The two models have been shown to produce very similar results, with small differences in results caused by Forge Solar incorporating surface roughness within its model. Forge Solar additionally conducts glare intensity

ExQ	Respondent	Question	Applicant's Response
			calculations, which are utilised in the assessment of impacts towards aviation receptors.
LV2.14	The Applicant	**Statement of Common Ground and Questions Raised by Stop Lime Down at Deadline 4** It is noted from the Statement of Commonality [REP4-059] that a draft SoCG between the applicant and Stop Lime Down is proposed to be submitted at deadline 5. In addition to the items requested by the ExA in ExQ1 LV1.28, the ExA request that written responses to the questions in paragraph 3.5.6 of Stop Lime Down's deadline 4 submission [REP4-132] are included, either within the SoCG or as a separate document.	The Applicant notes this request. A written response to the questions in paragraph of 3.5.6 of **Stop Lime Down's deadline 4 submission [REP4-132]** is provided in the **Applicant's Response to Deadline 4 Submissions [EN010168/EXAM/9.55]**.

2.14 Land Use, Soils and Food Security

Table 2-14 Land Use, Soils and Food Security

ExQ	Respondent	Question	Applicant's Response
LSF2.1	The Applicant	**Cable Route Construction Method Statement** In its deadline 4 submission [REP4-097], the EA, at reference EA-059, noted that the oCEMP [REP2-019] has been updated to include reference to the Discovery Strategy – as previously requested. In addition, Table 13 of the oCEMP has been revised in relation to the proposed ground investigation works. Given these updates, the applicant is requested to explain why Appendix 3-2: Cable Route Construction Method Statement [APP-183] has not been updated to reference the Discovery Strategy and, if appropriate, to provide an updated version of the document.	The applicant confirms that **ES Volume 3, Appendix 3-2 Cable Route Construction Method Statement [EN010168/APP/6.3]** (Revision 4) has been updated to include reference to the Discovery and Inspection Strategy (see section 1.2.4).

2.15 Noise and Vibration

Table 2-15 Noise and Vibration

ExQ	Respondent	Question	Applicant's Response
NE2.1	The Applicant	**Road Resurfacing** Paragraph 3.5.18 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that groundborne vibration impacts associated with construction traffic have been scoped out on the basis that the resurfacing of the roadway as part of the scheme would result in a smoother running surface and would therefore reduce any existing vibration impact that may already exist. The ExA is unclear on which roadway(s) would be resurfaced as part of the scheme to justify scoping out vibration impacts from construction traffic and where/ how this resurfacing is secured. Please advise and direct the ExA to where this information is provided in the application documents. If this information is not contained in the application documents, the ExA requires the applicant to assess the potential impact of groundborne vibration impacts from construction vehicles on any of the sensitive receptors listed in Table 14-12 and Table 14-13	Groundborne vibration from construction traffic would only be an issue if there were significant road defects (such as a large pothole) in the wheel track. The **Outline Construction Traffic Management Plan [REP4-057]** commits to a road condition survey prior to the construction programme in Section 6.12. Where existing potholes are identified, these would need to be repaired by the local highway authority. If potholes occur because of construction traffic or are made worse by construction traffic, these would be picked up by the interim road condition surveys and repaired by the Applicant.

ExQ	Respondent	Question	Applicant's Response
		of ES Chapter 14 [REP1-021] (and any listed buildings which are not captured in those tables) which are on or in close proximity to (i.e. 25m) of the construction routes, or provide a detailed explanation as to why this is not considered to be necessary.	
NE2.2	The Applicant	**Noise Monitoring Location LT7** In response to ExQ1 NV1.4 [REP3-128] the applicant advised that the sound level meter at LT7 stopped monitoring after approximately 14 hours of a week-long survey, due to a technical issue with the meter, and that the limited data collected was inconsistent with typical expectations for a rural setting, as the background night-time sound levels were over 10 dB higher than those during the daytime. Explain why repeat noise surveys at LT7 have not been undertaken, given that data from LT7 would have been used to inform the baseline sound level at R24 (Lordswood Cottage) and R25 (Commonwood Farm)? If the applicant considers that noise surveys at another location were sufficient to inform the baseline level at R24 and R25 please explain this further, including the distances of the LT7	LT8 was determined as a suitable proxy monitoring location for LT7 for several practical reasons; both locations are at similar distances from the railway line to the south, and neither is situated close to a main/busy road (unlike locations such as LT1 and LT6). This indicates that LT8 provides a suitably representative proxy location for LT7 in terms of the dominant noise sources and the overall noise climate. In addition, the sound levels measured at LT8 are broadly consistent with what the Applicant would expect at R24 and R25 after reviewing the range of levels reported in **ES Volume 3, Appendix 14-3 Baseline Noise Survey [APP-236]**.

ExQ	Respondent	Question	Applicant's Response
		meter from those receptors and the distance(s) of any other meter(s) relied upon from R24 and R25.	In terms of the identified receptors, R25 is approximately 500 m from LT7 and 1,200 m from LT8, and R24 is approximately 400 m from LT7 and 650 m from LT8. While LT8 is further from these receptors than LT7, the locations are within the same rural context and subject to similar sound sources; the difference in distance is therefore considered acceptable for the purpose of establishing representative baseline sound levels.
NE2.3	Wiltshire Council	**Background Noise Level Methodology** In ExQ1 NV1.5 the ExA asked the Council to reconsider whether the applicant's use of fixed 30dB as a minimum background noise level at night continued to be appropriate. In its response [REP3-142], the Council presented the relevant British Standard and guidance and agreed that it was acceptable to replace background noise measurements with a fixed level as the applicant had done. The ExA appreciates the Council's explanation of the relevant British Standard and the associated guidance from the Association of	Justification for the Applicant's position is provided in item SLD-233 within the **Applicant's Response to Written Representations [REP2-039]**. Therein it is clarified that the definition of SOAEL for Lime Down is more stringent than the majority of accepted solar farm DCOs, even those in rural areas, in acknowledgment of the receiving environment. There is no evidence that the Applicant is aware of to support the assertion that background sound levels of 20 dB would lead to a lower threshold for

ExQ	Respondent	Question	Applicant's Response
		Noise Consultants, which appears to allow for such an approach, but the ExA nonetheless still queries whether the effect of doing this firstly ignores the context of the receiving environment, and secondly artificially raises the baseline and therefore raises the LOAEL and SOAEL level (which is set against the baseline), which in turn informs the assessment of significance in EIA terms. The ExA would welcome a further response from the Council to these queries, particularly as the definition of 30dBLA90 as a 'very low' background level was removed from the British Standard and is not supported by the current version of BS4142:2014, and given the rural location where background levels at night were found for some residential receptors to be as low as 20dB and may therefore have given rise to a lower threshold for receptor sleep disturbance than the internal noise levels recommended in both BS 8233:2014 and the World Health Organisation (WHO) Guidelines, which were also cited by the Council.	sleep disturbance and, as evidenced by **ES Volume 3, Appendix 14-3 Baseline Noise Survey [APP-236]**, existing ambient noise at night in the area already regularly exceeds 35 dB, the loudest external levels expected from the Scheme.
NE2.4	The Applicant	**Operational Noise Level Mitigation**	The receptors identified in Paragraph 14.10.50 of **ES Volume 1, Chapter**

ExQ	Respondent	Question	Applicant's Response
		In response to ExQ1 NV1.8 [REP3-128], the applicant refers to the national policy for noise and vibration, in which significant effects are identified as those above the SOAEL. It added that, as moderate effects for the high sensitive receptors listed in Table 14-12 and Table 14-13 (of ES Chapter 14) correspond to levels above the LOAEL and below the SOAEL they are excluded from the classification of significance for noise and vibration as they are below the SOAEL. On reviewing the Noise Policy Statement for England (NPSE), the ExA notes that it describes LOAEL as the level above which adverse effects on health and quality of life can be detected, whilst SOAEL is described as the level above which significant adverse effects on health and quality of life occur. This appears to confirm the applicant's position in its ExQ1 NV1.8 response around significant effects. Nonetheless, whilst the first aim of the NPSE is to avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise, its second aim it to mitigate and minimise adverse	**14 Noise and Vibration [REP1-021]** are predicted to experience noise levels between the LOAEL and SOAEL at night-time when only plant in the central BESS area is operational. In this instance, all practicable, effective and sustainable mitigation to minimise levels has been applied as detailed in Section 14.9 of **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]**. As explained in item NV1.11 of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**, further silencer units would provide negligible benefits in terms of noise levels and would therefore not sit within the guiding principles of sustainable development. As such, the second aim of the NPSE to minimise noise levels, within the context of sustainable development, has been met. However, the Applicant acknowledges that this aim also applies to the 27 receptors identified in Paragraph 14.10.48 of **ES Volume 1, Chapter**

ExQ	Respondent	Question	Applicant's Response
		impacts on health and quality of life from environmental, neighbour and neighbourhood noise. The NPSE clarifies that the second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL and it requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development. Paragraph 14.10.50 of ES Chapter 14 [REP1-021] states that 16 receptors are predicted to experience operational noise levels between the LOAEL and SOAEL: • North of Hullavington around Lime Down D (R10 – Bradfield Manor); • Norton between Lime Down B and D (R15 - Gorsey Leaze House, R16 – West Lodge, R41 – Honey Lane Cottage, R43 – Vine Tree Cottage, R44 – Orchard Cottage); • North of Grittleton around Lime Down C (R19 – Surrendell Farm);	**14 Noise and Vibration [REP1-021]** that are predicted to experience noise levels between the LOAEL and SOAEL during the daytime. In this instance, all plant is operational and, in addition to the embedded mitigation outlined in Section 14.9 of **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]** covering the layout of the Scheme, the 132kV substation transformers and the central BESS area, the Applicant has carefully considered the mitigation for the conversion units. Five of the receptors between the LOAEL and SOAEL during the daytime (R12, R22, R25, R31 and R34) are predicted to experience noise levels that marginally exceed the LOAEL and the Applicant is willing to commit to these levels being reduced to below the LOAEL through the detailed design process. At eighteen further receptors between the LOAEL and SOAEL during the

ExQ	Respondent	Question	Applicant's Response
		• Pig Lane between Lime Down C and D (R20 – Townleaze Farm, R21 – Farleaze South, R23 – Farleaze Cottages, R45 – Grain Store Barn); and • Ladyswood around Lime Down A and C (R28 – Lordswood Farm, R29 – Ladyswood Farm, R30 - Ladyswood Cottage, R35 – Fosse Farm, R36 – Lordswood Cottage) Paragraph 14.10.56 adds that the oOEMP commits to the resulting levels at properties to provide reassurance that the Scheme as built will not lead to significant effects from noise. The ExA is concerned that this does not demonstrate compliance with the NPSE and the requirement to mitigate and minimise adverse effects, rather merely commits to operational noise remaining between LOAEL and SOAEL, which for those 16 receptors would be worse than the present situation. The ExA therefore requests the applicant's clear position on whether it can commit to lower noise emissions and targets for those 16 high sensitivity receptors in the oOEMP, taking	daytime, conversion units are not the only contributing factor to the noise from the Scheme. As such, applying silencer units in these areas would not materially reduce noise levels at properties. Given that silencer units require regular and onerous maintenance to stop dust and debris building up, which can mean that the unit has to be electrically isolated, and risk airflow blockages leading to potential performance issues, it is not within the context of guidance on sustainable development to apply silencers to units in these areas. At the remaining four locations between the LOAEL and SOAEL during the daytime (R24, R41, R42 and R43), silencers would make a material reduction in noise. As such, the Applicant is willing to commit to lower levels in these locations that have been derived from applying silencers to conversion units in these areas. Noise predictions in the **ES, including ES Volume 1, Chapter**

ExQ	Respondent	Question	Applicant's Response
		proper account of the very quiet rural nature of the area in which those properties are situated, and the NPSE aim of mitigating and minimising adverse noise impacts.	**14 Noise and Vibration [REP1-021], ES Volume 2, Figure 14-2 Daytime Operational Noise Contours [APP-160]** and **ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061]**, have been updated at Deadline 5 to reflect this commitment. These updates are secured through the **Outline Operational Environmental Management Plan [EN010168/APP/7.13]** (Revision 6), which commits to the noise from the Scheme being no higher than the levels presented in the ES.
NE2.5	The Applicant	**Noise Monitoring During Commissioning Phase** To provide greater reassurance to residents that the applicant is committed to identifying and resolving noise impacts swiftly, would the applicant consider committing to undertaking noise monitoring during the immediate commissioning phase for each part? If not, why not? Should the applicant agree to noise monitoring during commissioning, confirm how long this would last and how this would be	The Applicant is willing to agree to noise monitoring following commissioning to help identify and quickly resolve noise impacts. Monitoring would last one week to capture potential fluctuations in the operating load of the plant. Monitoring would be carried out around the central BESS area and compared to the detailed design modelling already committed to in the **Outline Operational Environmental**

ExQ	Respondent	Question	Applicant's Response
		representative of the noise impacts on residents during the lifetime of the full operational phase. Also, how might this proposed noise monitoring be secured in the dDCO and what would happen if the noise levels during commissioning were found to be higher than the noise levels identified in the ES?	**Management Plan [EN010168/APP/7.13]** (Revision 6). This provides a consistent and reliable basis upon which to determine noise impacts on residents. Monitoring at residential properties would not be as reliable because it would pick up local noise sources not associated with the Scheme. Table 8 of the Outline OEMP has been updated to include this commitment, alongside the existing commitment to repeat this exercise each year throughout the lifetime of the Scheme. The Outline OEMP states that "The results of such monitoring will be submitted to the relevant planning authority for review within 4 weeks of the survey. Where this review indicates plant noise levels generated by the Scheme have materially increased, the report to the local authority will include an action plan and appropriate timescales for resolving the issue. The undertaker and relevant planning authority will

ExQ	Respondent	Question	Applicant's Response
			then liaise in respect of any further maintenance or mitigation required to reduce levels at receptors back to those presented in the ES."

2.16 Socio-Economics

Table 2-16 Socio-Economics

ExQ	Respondent	Question	Applicant's Response
SE2.1	Wiltshire Council	**Economic Impacts Q1** The SoCG with Wiltshire Council [REP4-061], section 3.12.5, raises concerns over the local impact on the tourism industry with losses of approximately £1.76million. The applicant's response is that this figure represents less than 0.15% of the value of the combined tourism industry in Wiltshire. However, it is not the entirety of Wiltshire where these losses will be felt, but the local area around the proposed development, so this figure will have a more significant effect. This is discussed further in the applicant's response to deadline 3 submissions [REP4-082], section WC-035, where the applicant states that within a 5km area from the proposed development the losses would equate to 0.7%. The SoCG with Wiltshire Council section 3.12.11 suggests a	The Applicant acknowledges that within the 5 km Study Area there will be variation as to the extent which businesses are affected by the Scheme. Simplistically, there is an expectation that those in closest proximity to the Scheme are likely to see the greatest level of effect. The economic effect to businesses is anticipated to be closely linked to the likely significant effects on tourists and visitors to locations surrounding the Scheme, as has been demonstrated in the range of likely effects determined in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. In acknowledgement of this, the Applicant has sought to ensure that the embedded and additional mitigation measures proposed have a material impact on reducing the likely significant effects to local businesses that are most likely to be affected by the Scheme. This includes the following measures secured by the respective requirements in Schedule 2 of the **Draft DCO [REP4-004]**:

ExQ	Respondent	Question	Applicant's Response
		compensation scheme for businesses to alleviate the negative effects on local businesses [REP4-061]. <u>The Applicant:</u> 1. Although losses might equate to less than 1% within a 5km area this could be quite significant to an individual business resulting in job losses and a loss of income below basic operating costs. The applicant is asked to detail its objection to the Council's suggestion of a compensation scheme to keep businesses operating during construction, maintenance and decommissioning given funding such a scheme should not be significant. <u>Wiltshire Council:</u> 2. You are asked to provide details of such a business	• Embedded design parameters to reduce physical and visual impacts on surrounding receptors – as secured through the **Design Principles and Parameters [REP4-043]** by Requirement 5; • Landscape planting and screening to reduce long-term visual effects – as secured through the **Outline Landscape and Ecological Management Plan [REP3-100]** by Requirement 7; • Embedded and additional construction impact mitigation to control physical impacts from noise and air quality and procedural impacts for social impacts – as secured through the **Outline Construction Environmental Management Plan [REP4-049]** by Requirement 13; • Embedded and additional operational impact mitigation to control long-term impacts from onsite activity throughout the operational lifetime of the Scheme – as secured through the **Outline Operational Environmental Management Plan [REP4-051]** by Requirement 14; • Embedded and additional transport impact mitigation to ensure construction traffic does not

ExQ	Respondent	Question	Applicant's Response
		compensation scheme, including further justification, how this would work, including the administration, eligibility and what measures would prevent businesses from taking advantage of it. You are also asked to detail how this would fit within the structure of the DCO or if it should be implemented via a s106 agreement.	cause significant impacts to road users accessing businesses, or to business or service providers accessing customers and clients – as secured through the **Outline Construction Traffic Management Plan [REP4-053]** by Requirement 15; • Embedded and additional mitigation for public rights of way to ensure impacts to users of public rights of way, for leisure, recreation, or accessing services (and therefore in direct relation to footfall to businesses) are minimised at all phases of the Scheme – as secured through the **Outline Public Right of Way and Permissive Paths Management Plan [REP1-104]** by Requirement 16; • Embedded mitigation and additional enhancement measures for businesses directly or closely affected by the Scheme to ensure they have access to skills and training opportunities, have opportunity to directly benefit from the Scheme where they are able to join the supply chain or provide contributing services, while individual workers have greater opportunities for skills improvement, apprenticeship and employment opportunities generated by the Scheme – as secured through the **Outline Skills**

ExQ	Respondent	Question	Applicant's Response
			Supply Chain and Employment Plan [REP3-104] by Requirement 18; and • Embedded decommissioning impact mitigation to control physical impacts from decommissioning activities – as secured through the **Outline Decommissioning Statement [REP3-096]** by Requirement 20. Together, these demonstrate the extent of measures the Applicant has committed to, to ensure that impacts to businesses (as well as the individual people who own, work for, and use them) are minimised, while opportunities to enhance the local economy are open to being explored further once the Scheme is consented. The Applicant also seeks to reiterate that the Scheme is anticipated to bring benefits to economic receptors such as increased spending from the construction, operational, and eventual decommissioning workforce on accommodation, food, and any other expenditures they may be required to make. Again, the Applicant is cognisant that this is more likely to be felt widely across the 20 km Study Area rather than directly within the more local areas surrounding the Scheme. The Applicant also seeks to reiterate that the Scheme directly contributes to the long-term financial

ExQ	Respondent	Question	Applicant's Response
			stability for owner-occupier farm holdings with land agreements under the Scheme, allowing them to invest in any remaining parts of their agricultural holdings. The Applicant therefore considers it can demonstrate that all measures required to deliver the Scheme, and therefore make the DCO acceptable to be consented, have been provided. Furthermore, the Applicant considers that the proposition of a further business compensation scheme goes beyond that requirement in a manner that is unprecedented for a project of this nature. The Applicant understands that Wiltshire Council's response to this question at Deadline 5 will provide more detail on the Council's position and proposals for any business compensation scheme, which can be discussed further once received and reviewed. The Applicant is continuing to engage with Wiltshire Council through the **Statement of Common Ground [REP4-061]** to understand the extent to which there is not yet agreement on the economic mitigation measures proposed by the Applicant.
SE2.2	The Applicant	**Economic Impacts Q2** The applicant is asked to provide a technical note on the impact on non-equine local businesses within a 5km	The Applicant has submitted a **Technical Note on Impacts to Non-Equine Business [EN010168/EXAM/9.68]** at Deadline 5 as requested. With specific respect to the 4no. examples set out in this

ExQ	Respondent	Question	Applicant's Response
		area of the proposed development. This should detail the nature of the affected business, their concerns, and what the applicant has done to address those concerns. Additionally, the ExA has the following specific queries: Grittleton House – In [REP4-082] (Refs. WC-105 and VJS-001), the applicant responds to concerns regarding impacts on Grittleton House. The applicant comments that it is open to discussions with the operators of the property whose business as an events venue could be adversely affected by the proposed development. Specific concerns relate to the location of a construction compound at Grittleton. The applicant is asked to provide an update to these discussions and what measures it has undertaken to reduce impacts on the business/ alleviate concerns or compensate for any loss in bookings/ income over	question, the Applicant has responded to these points below: **Grittleton House** The Applicant confirms that following prior engagement in in May 2026, discussions with the owners and operators of Grittleton House are being organised to discuss the likely significant effects of the siting of the construction compound and Cable Route Corridor on the business at Grittleton House. These are to supplement discussions held earlier in the examination process which focused on heritage effects. The Applicant seeks to use these discussions to provide more detail and assurance to the owners and operators of Grittleton House. These discussions will cover what construction impacts at this location are anticipated to consist of, how long those works are likely to take place, and what this means for their business and clientele. The discussion is likely to largely focus on the future Stakeholder Communication Plan, and the operation of the Community Liaison Group, as is to be secured through Requirement 4 and via the **Outline Construction Environmental Management Plan [REP4-049]** by Requirement 13 in Schedule 2 to the **draft DCO [REP4-004]**.

ExQ	Respondent	Question	Applicant's Response
		the construction period. In addition, the applicant is requested to provide details of its site selection process for the construction compound and evidence for its location and how it considered the possible impacts on Grittleton House. Note that this should provide more detail than that provided in [REP4 082] (Ref. VJS-009). Whatley Manor – Submissions [REP4-103 and REP4-134] both raise concerns of the proposed development on Whatley Manor and its operations. The applicant is requested to respond to these concerns and detail how they have been addressed. Foxley Road Nurseries – Post hearing submission [REP4-109] references that the business is 'extremely seasonal'. The applicant is requested to consider whether they can control the timing of works to	This is so that the business owners at Grittleton House can understand how they are to be communicated with ahead of and during construction activities, and how they will be able to inform and influence construction works in this location, either as directly affected stakeholders or (if they wish to) as members of the Community Liaison Group. The Applicant predicts that most construction works in this location can be flexibly suited to most of the business' needs and would only have to rely on physical mitigation measures where there was an unavoidable crossover between events and construction works. With these measures in place, the Applicant considers that there is not anticipated to be a significant impact to the business or its clientele, and therefore there is no specific need for compensatory payments to be made in addition to the mitigation measures already secured. As has been set out in **Applicant's Response to Submissions Received at Deadline 3 [REP4-082]**, reference VJS-008, the decision-making for selecting this location for a construction compound is the result of the requirement to deliver this section of the Cable Route Corridor within the environmental constraints present. Access to the Cable Route Corridor is required approximately for every 2 km of works. As this section is ~3.2 km long, two access

ExQ	Respondent	Question	Applicant's Response
		avoid the peak seasonal operations of this business. The Angel, Sherston – Submission [REP4-113] raises concern of the loss of clientele resulting from landscape and visual impacts and ambience of the surrounding area and PRoW network. The proposal will have some impact on footpaths with the potential displacement of users. The applicant is asked to consider how the proposal could adversely impact on this business and what measures may be undertaken to lessen the impact.	points are needed. Furthermore, due to the need for horizontal direction drilling to cross the Gauze Brook and the M4 motorway, a construction compound was needed to facilitate any deliveries, site management, and temporary equipment storage required to facilitate construction of this section of the Cable Route Corridor. Whilst environmental constraints covering all topics were considered, there were principal, deciding factors for ensuring that the Scheme was capable of being undertaken. This is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Most prevalent of those in this location was transport and access, and the need to be able to access the Cable Route Corridor between the Gauze Brook and the M4 motorway. This gave limited opportunities for gaining vehicular access to the Cable Route Corridor, with only The Street through Grittleton village, and the unnamed road through Foscote capable of reaching this area. Access was considered most appropriate to be taken from The Street from the west to facilitate both access points required. Whilst this has width and geometry

ExQ	Respondent	Question	Applicant's Response
			constraints through the village of Grittleton, this was considered the best route of the alternatives available. The road through Foscote is much narrower and has less traversable geometry for large vehicles at its junction with the Grittleton to Yatton Keynell Road. Access from the east was also less favourable due to vehicles having to travel further on narrower roads, with similar width, geometric and social constraints (primary schools, vulnerable populations, on-street parking) where passing through any of the villages of Hullavington, Stanton St Quintin, or Kington St Michael. When selecting the construction compound location either to the north or south of The Street, the location of existing overhead power lines, and the immediate proximity to a sports field, play area, and community facility were deciding factors in determining that the field to the south of The Street was preferable from a socio-environmental perspective. **Whatley Manor & Spa** The Applicant has responded to the representations made by Whatley Manor Hotel & Spa **[REP4-103** and **REP4-134]** at WM-001 to WM-005 in the **Applicant's Response to Deadline 4 Submissions [EN010168/EXAM/9.55]**, and to oral representations made in Open Floor Hearing 2 to

ExQ	Respondent	Question	Applicant's Response
			which the Applicant has responded at section 2.5 and 2.6 of **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]**. These respond to each of the matters raised in the representations, and refer to where previous representations have already been addressed by the Applicant. **Foxley Road Nurseries** The Applicant has responded to the comments made in representations made by Foxley Road Nurseries **[REP4-109]** at section 2.13 of **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]**. These respond to each of the matters raised in the representations, and refer to where previous representations have already been addressed by the Applicant. **The Angel Café, Sherston** The Applicant has responded to the comments made in representations made on behalf of The Angel Café in Sherston **[REP4-113]** at section 2.12 of **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]**. These respond to each of the matters raised in the representations and refer to

ExQ	Respondent	Question	Applicant's Response
			where previous representations have already been addressed by the Applicant.
SE2.3	The Applicant Wiltshire Council Interested Parties whose community facility they consider will be adversely affected by the proposed development	**Compensation for Community Facilities** <u>All Parties:</u> The SoCG with Wiltshire Council, section 3.12.11, suggests a business compensation scheme [REP4-061]. Aside from the compensation to businesses there have been concerns raised by operators of community facilities that the proposal will result in their closure resulting from a lack of bookings during the construction, maintenance and decommissioning phases. Examples include [RR-2749], [RR-4315], [RR-4617]. All parties are asked to consider if they would be agreeable to a community facility compensation fund that would ensure they remain open and functional during the aforementioned phases and available for community	The Applicant refers to its response to question SE2.1 above. As with impacts to businesses, the Applicant has sought to ensure impacts to community facilities are mitigated through the measures already set out through the management plan secured by each of the relevant requirements in Schedule 2 to the **Draft DCO [REP4-004]**. The Applicant maintains that the potential impacts of the Scheme on formal recreation and community facilities have been fully and robustly assessed within **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068] and ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. These assessments, which included specific receptors such as Grittleton Village Hall, concluded that while there may be some level of "*temporary moderate-minor adverse effect*" during construction, these do not constitute a significant effect. Consequently, the Applicant does not consider it likely that these facilities are at risk of significant effects to the operation, or closure, as a result of the Scheme. Mitigation for these facilities is already secured through the **Outline Construction Traffic Management Plan (CTMP) [REP4-**

ExQ	Respondent	Question	Applicant's Response
		use despite any negative effects of the proposed development. The applicant should note that simple reference to the Community Benefit Fund is not considered an appropriate response. <u>Wiltshire Council:</u> You are asked to provide details of such a community facilities compensation scheme, including further justification, how this would work, including the administration, eligibility and what measures would prevent businesses from taking advantage of it. You are also asked to detail how this would fit within the structure of the DCO or if it should be implemented via a s106 agreement.	**057]**, which mandates HGV booking systems and coordination to reduce disruption in village centres, and the Community Liaison Group (CLG), which ensures facility operators are informed of site activities in advance. The Applicant considers that a specific compensation fund based on a lack of bookings would be disproportionate and difficult to implement. Income levels for community facilities are influenced by a broad range of uncontrollable macro-economic factors, such as the cost of living or shifting local demographics, making it impossible to directly and measurably attribute a specific booking decline solely to the Scheme. Because the Environmental Statement identifies no significant residual adverse effects on the viability of these facilities following the implementation of secured traffic and noise controls, the Applicant maintains that a financial compensation mechanism for community facilities is not necessary. However, to address the underlying concern that facilities might lose bookings due to perceived disruption, the Applicant proposes to use the Stakeholder Communications Plan, secured via the **Outline Construction Environmental Management Plan [REP4-049]** by Requirement 13 as set out in the **draft DCO [REP4-004]**. This mechanism will provide facility operators with a direct line of contact and advanced

ExQ	Respondent	Question	Applicant's Response
			schedules of construction activity, enabling them to provide certainty to potential hirers and wellbeing class participants. This would help align any quiet environment bookings these facilities depend on with construction activity, and ensure the venues are, where practicable, protected during sensitive hours through site management controls and the perceived risk to bookings can be managed without the need for a separate compensation fund. Finally, the Applicant clarifies that a compensation fund linked to the DCO in these instances, would likely fail the statutory tests for planning obligations, as it would not be directly related to the development in the absence of a significant identified harm. While acknowledging the ExA's instruction and the Applicant's firm commitments to date regarding a Community Benefit Fund (CBF), the Applicant maintains that the CBF's structure which includes an independently facilitated, locally-led decision making panel and local needs analysis is the appropriate home for requests seeking to support community venues and activities.

ExQ	Respondent	Question	Applicant's Response
			The CBF provides a flexible, community-led platform to provide resilience to local facilities that does not require a demonstrative need to meet strict evidentiary and necessity thresholds. The Applicant also considers that the CBF as a mechanism would ensure that businesses are not over-represented, and not-for-profit community facilities and ventures are given sufficient importance should they apply or be nominated for funding.
SE2.4	The Applicant	**Local Economic Benefits** Wiltshire Council's deadline 4 submission [REP4-091] section SE1.3 questions the applicant's use of a generic 20km radius in assessing commuting distances and business impacts. Furthermore, it questions the economic benefits the proposal will deliver to the local area given the low unemployment rates in major population centres closest to the Order limits. The Council also queries if any mapping has been done to show potential supply chain	The Applicant has responded to Wiltshire Council's comments **[REP4-091]** in the **Applicant's Response to Submissions Received at Deadline 4 [EN010168/EXAM/9.55]**. A 20 km Study Area has been selected as this roughly corresponds to a 30-minute commuting time by road for workers on the Scheme. This has been deemed appropriate to approximate the area within which workers on the Scheme may live or be accommodated within and reasonably commute to the Scheme for work (either by car or minibus). Furthermore, this is also considered a reasonable estimate for distance that suppliers may be located within wherein there is a suitable level of access to the Scheme for travel or transporting resources.

ExQ	Respondent	Question	Applicant's Response
		businesses that might benefit from the proposed development. The applicant is asked to respond to these points as the ExA considers that it will provide a clearer picture of the likely local economic benefits that could be experienced by the local area, rather than on a regional or national basis.	Using a 20 km Study Area, rather than relying on administrative boundaries, ensures consideration of all surrounding population centres have been considered (including as referenced: Swindon and the northeast parts of the urban area of Bristol). The Applicant recognises that this is a wide area within which economic benefits are likely to be felt, reflecting the likely dispersal of where construction workers, suppliers, and eventual site operators are likely to live or be accommodated in. The Applicant recognises adverse effects from the Scheme are more likely to be felt within a more localised area – hence using a 2 km and 5 km Study Area for effects to agriculture, or landscape- and visitor-dependent business sectors. These have been reported at the same scale to ensure a like-for-like comparison of the benefits versus adverse effects can be understood. It is because of the different in area likely to see beneficial verses adverse effects that the Applicant has committed to the measures in the **Outline Skills Supply Chain and Employment Plan [REP3-104]** as secured by Requirement 18 of the **Draft DCO [REP4-004]**. These include measures to provide training and skills uplifting opportunities, and employment opportunities focussed within the areas closest to the Scheme, to seek to provide a more localised economic benefit.

ExQ	Respondent	Question	Applicant's Response
			In the assessment of likely economic benefits arising from Scheme in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, the Applicant considered the number of people working within the construction of utility projects within the 20 km Study Area (2023, BRES – industry "42.2: Construction of Utility Projects") of 280 was an absolute maximum for determining employment generated within that area. The Applicant also considered that due to the specialisms required for building the Scheme, the level of displacement of workers from other similar projects would be 50%, based on the 'medium' displacement factor in HCA Additionality Guide. This is also considered appropriate given the lower levels of unemployment seen in some parts of the 20 km Study Area as referenced by Wiltshire Council that would make recruiting new employees more difficult, hence contributing to the displacement of work from other similar projects in the same period. The Applicant has not undertaken a mapping or spatial investigation of potential supply chain businesses up to this stage, and considers that this would be best discussed in detail in coordination with Wiltshire Council and any additional stakeholders during the production and determination of the detailed Skills Supply Chain and

ExQ	Respondent	Question	Applicant's Response
			Employment Plan pursuant to Requirement 18 of the **Draft DCO [REP4-004]**.
SE2.5	The Applicant	**Permissive Paths Q1** In response to ExQ1 SE1.1 [REP3-128] the applicant stated that it could not create onward highway connections for MALW50 and GSOM15 because this would require third party land outside the Order limits, would require new rights of way to be established that may prejudice the future use of the land within the Order limits, and would have environmental effects on hedgerows, trees and waterbodies (a stream and pond) that may substantially alter the applicant's approach to drainage and ecological mitigation. However, the applicant then goes on to say that it is still discussing if improvements to MALW50 and GSOM15 can be delivered through the allocated funding within the Community Benefit Fund, with the Council leading on	The Applicant confirms that land rights, environmental constraints and the legal status of any connections to the identified dead-end public rights of way are all active considerations in why connections to footpaths MALW50 and GSOM15 have not been pursued through the DCO process. **Environmental** The environmental implications cited, including potential impacts on hedgerows, trees, streams and ponds are genuine constraints in the context of the DCO application. The Scheme's drainage and ecological mitigation strategies have been designed and secured to achieve specific outcomes, such as Biodiversity Net Gain and maintaining greenfield runoff rates. Forcing a PRoW connection through these sensitive areas within the DCO, notably at MALW50 at the Gauze Brook, could alter these secured strategies, requiring a redesign of the project's environmental mitigation framework. Because the Environmental Statement concludes that the Scheme has no significant residual adverse effects on the wider PRoW network, such a

ExQ	Respondent	Question	Applicant's Response
		establishing new rights of way with the engagement of the relevant landowners. The ExA is perplexed as to why the applicant considers the connections could still be created with funding allocated within the Community Benefit Fund if, as it suggests, the creation of new highway connections for these two footpaths may prejudice the future use of the land within the Order limits, and would have environmental effects on hedgerows, trees and waterbodies (a stream and pond) that may substantially alter the applicant's approach to drainage and ecological mitigation. The applicant is therefore asked to clarify whether its main issue against proactively facilitating the creation of onward connections for MALW50 and GSOM15 relates to land rights or the environmental implications, as the suggestion of creating the connections through Community	redesign is not considered necessary for the project to be acceptable in planning terms. **Land Rights** Additionally, the ExA rightly references land rights as another obstacle in achieving connectivity of the PRoW network within the Scheme's Development Consent Order as the Applicant does not possess the necessary land rights or legal powers to do so. This has been communicated to, and informed discussions with, Wiltshire Council as part of ongoing negotiations regarding additional funding for the wider PRoW via the Community Benefit Fund (CBF). It is noted between the parties that officially, GSOM15 PRoW designation terminates around 5m short of the fenceline into the Scheme's order limits. Presently, users of the GSOM15 meet the Western edge of the designated route, and then technically trespass for those 5m to reach Field E33, within which there is currently no formal public or permissive right of access. The missing link in the PRoW on GSOM15 is something which Wiltshire have confirmed is something that should be rectified, and the Applicant has secured the permission for the route in E33 and beyond within the Order limits to be used on a permissive basis.

ExQ	Respondent	Question	Applicant's Response
		Benefit Funds suggests the environmental implications cited are not constraints at all.	Additionally, creating onward connections for routes such as MALW50 and GSOM15 in a way which the Applicant could have control on a permissive basis, would require the acquisition of third-party land outside the Order Limits, with the permissive nature of the route potentially capable of being withdrawn. Given these potential onward connection areas are not considered to be required as part of the mitigation for socio-economic effects under the ES (see the conclusions in the **Technical Note on Alternative Access to the Public Rights of Way Network [REP4-080]**) and any contribution towards these under the CBF are not relied upon for planning balance, the Applicant also does not consider it could satisfy the compulsory acquisition tests for including these within the Scheme. The power to establish or alter the Public Rights of Way (PRoW) network sits solely with the local highway authority and is not a power sought by the Applicant within the **draft DCO [REP4-004]**. The Applicant considers that through the application of those powers, Wiltshire Council would be in a more favourable position to be able to determine the extent of benefits of enhancement to the PRoW network, independently of the Scheme. In doing so, this would consider if the social and health benefits outweigh the potential environmental effects and impacts to landowners,

ExQ	Respondent	Question	Applicant's Response
			or if there are alternative means of providing that connection that can be delivered with fewer environmental effects. Given the engagement held with Wiltshire Council officers regarding these missing links, the appropriate mechanism is provided by the Applicant to support these links being connected under the powers held by Wiltshire Council as the local highway authority. Consequently, these connections cannot be delivered as an integral part of the authorised development. However, through ongoing negotiations, the mechanisms and funding to provide these links can be established with Wiltshire Council.
SE2.6	The Applicant Wiltshire Council Wiltshire Bridleways Association (WBA)	**Permissive Paths Q2** A number of IPs [too many to list] have raised concerns about the impact on the enjoyment of footpaths in the Order limits. Concerns have also been raised that businesses will suffer as a result of a loss in recreational trade, for example [REP4-113]. The Council has suggested that an improvement fund should be provided by the applicant	The Applicant notes that Regulation 122 of the Community Infrastructure Levy Regulations 2010 makes it unlawful for any planning obligation to be taken into account if it does not meet the following tests: • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonable related in scale and kind to the development.

ExQ	Respondent	Question	Applicant's Response
		to cater for the displacement of users of the PRoW network within the Order limits [REP4-061]. It is considered that the enjoyment of the existing PRoW network within the Order limits will not be improved by the proposed development, regardless of additional connections and physical improvements. Therefore, the ExA considers that the Council's suggestion for a fund that seeks to improve the network outwith the Order limits to take account of displaced use, is not unreasonable. This would continue to encourage use of the wider PRoW network regardless of the effect the proposed development. This approach will likely provide mitigation for businesses concerned by the loss of recreational trade and benefits to the mental health of those concerned by the loss of ambience on the network. <u>The Applicant:</u>	These principles are reiterated in paragraph 4.1.18 of NPS EN1 (2023). The Applicant does not agree that the Council's proposal to secure funding for PRoW, improvements through a Section 106 agreement, is appropriate as such funding for the duration of the operation of the Scheme is not considered to be necessary to mitigate the impacts of the Scheme. Therefore, the Applicant's position is that such a funding contribution is not something that the Secretary of State could take into account when making the DCO. **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** set out that there are no significant adverse effects on the wider PRoW network or on public mental health once the secured on-site mitigation is in place. Furthermore, when specifically considering the extent of displacement of users onto the surrounding network, as set out in **Technical Note on Alternative Access to the Public Rights of Way Network [REP4-080]**, no significant changes to PRoW use was considered likely to occur due to the low existing patronage on some routes within the

ExQ	Respondent	Question	Applicant's Response
		1. The applicant is requested to detail specifically their objections to the Council's suggestion of PRoW improvement funds linked to the DCO via a suitable mechanism outwith the Community Benefit Fund, such as a s106 agreement, to improve paths outwith the Order limits to cater for increased footfall resulting from the adverse effect on paths within the Order limits. <u>Wiltshire Council:</u> 2. Please provide a suggested mechanism by which this should be agreed. If this is via a s106 agreement, then please provide draft wording, noting that a signed and executed s106 agreement would need to be submitted before the close	Scheme, and the dispersal effect of users choosing alternatives in the surrounding network. For this reason, funding for off-site paths would be more appropriately placed as a community benefit rather than necessary mitigation. The Applicant maintains that the voluntary Community Benefit Fund (CBF) is the most appropriate mechanism for delivering improvements to the PRoW network outside of the Order Limits. This allows for community driven initiatives where local stakeholders and the Council can identify specific priorities for funding without being bound by the strict "*necessity*" tests of the DCO process. The Applicant has already indicated that an annual sum or "ringfenced" contribution for PRoW upgrades, as requested by the Council, is a suitable type of project for the CBF to explore. The Applicant invites local groups, such as the Wiltshire Bridleways Association, to engage with the Community Liaison Group and the future CBF structure to determine how these voluntary funds can best support local access goals following DCO consent through the Community Benefit Fund, as requested by the Council. Local groups, including the Wiltshire Bridleways Association, are encouraged to work with the Community

ExQ	Respondent	Question	Applicant's Response
		of the examination for it to be considered by the SoS. 3. Additionally, the Council is asked to set out any role the WBA would be expected to have in contributing to the administration of this fund given its requests for improvements to the PRoW network as detailed in its SoCG with the applicant [REP4-073]. <u>Wiltshire Bridleways Association:</u> Should the applicant provide a fund for the improvement of the PRoW network as described and requested by Wiltshire Council, please set out what role you would expect to play in its administration, if any.	Liaison Group and help shape the future Community Benefit Fund. This would allow voluntary funding to support local access priorities after DCO consent is granted.
SE2.7	The Applicant	**Permissive Paths Q3** In the SoCG with WBA section 3.1.10 [REP4-073] the applicant states *the Scheme would result in significantly*	The Applicant confirms this is a typographical error and as assumed, should read '…*the Scheme would* **not** *result in significantly changed runoff…'*

ExQ	Respondent	Question	Applicant's Response
		changed runoff or inadequate drainage that could affect equestrian routes. The applicant is asked whether they have missed out the word 'not', or to clarify this statement and provide further detail.	The Applicant has therefore amended this and submitted a revised **Statement of Common Ground with Wiltshire Bridleways Association [EXAM/8.17]** at Deadline 5 for completeness.
SE2.8	The Applicant	**Equine Business Impact Report** The applicant's response to ExQ1 SE1.9 [REP3-128] committed to submitting an assessment of the proposed development on equestrian businesses at deadline 4. This was not submitted as expected. The applicant is advised that this needs to be submitted at deadline 5 and no later, to allow interested parties fair opportunity to review and provide comment before the next set of hearings. The applicant should provide a detailed response to the concerns raised in [REP4-116, REP4-117], [REP4-107, REP4-108], [RR-0145], [RR-2102], [RR-0472], [RR-0098], [RR-3583] and the	The Applicant acknowledges that the commitment to provide the assessment of impacts to equine business was not met for Deadline 4. Whilst regrettable, the Applicant has used this additional time to allow more time for stakeholders to respond to questionnaires to ensure the assessment piece is as informed as can be, and responds to the most recent written representations made on equine matters. The Applicant has submitted the full **Equine Business Report [EN010168/EXAM/9.62]** and relevant mapping at Deadline 5. The study has sought to respond to matters raised by all Interested Parties (including those referenced by the Examining Authority) in respect of direct health impacts on horses, impacts on safety to horses, their riders and handlers (including professional service providers) both in paddocks and stables or out on roads

ExQ	Respondent	Question	Applicant's Response
		sensitivities of these businesses to the proposed development. Please note this should be submitted as a technical note, provide a more detailed and considered assessment than that provided in [PDA-009, PDB-004, REP1-117] and demonstrate an understanding of the effects of the proposed development on equestrian businesses.	and PRoWs, and the resultant direct and indirect impacts on equine businesses.
SE2.9	The Applicant	**Community Liaison Group** Requirement 4 of the dDCO sets out the terms of the CLG [REP4-004]. However, it makes no mention of its function, if any, during maintenance/ replacement activities or during decommissioning. The ExA considers the CLG should retain a function throughout the key phases of the life of the proposed development to include maintenance/ replacement activities and decommissioning, and requests	The Applicant confirms that the Community Liaison Group is committed to being set up through the construction phase, peak replacement activities, and the decommissioning phase of the Scheme. The Applicant confirms that they had already updated Requirement 20 at Deadline 3 **[REP3-005]** to ensure that it was explicit that the Community Liaison Group is committed to being set up ahead of decommissioning. For the Operational Phase, Requirement 4 already provides that the CLG must continue to meet for the first year of operation, and the **Outline Operational Environmental Management**

ExQ	Respondent	Question	Applicant's Response
		that the applicant updates Requirement 4 accordingly. Furthermore, both Stop Lime Down [REP4-132] and Wiltshire Council [REP1-137] raise concerns over the function of the CLG and consider that it should operate in a collaborative manner with communities to allow them the chance to shape the final design of the project in a meaningful way. Stop Lime Down also comment on developing an effective communication strategy and the employment of a relationship manager. The applicant is asked to update the terms of the CLG to include reference of its function through the key phases of the proposed development during operation/maintenance and decommissioning as these periods are likely to raise similar community concerns as those during construction. The updated terms	**Plan [REP4-051]** provides that it will be re-established for the planned replacement activities (see Table 13): *"During the planned replacement of all Solar PV Panels, the Community Liaison Group established during construction will be resumed as a formal forum for local issues to be raised. A Community Liaison Manager will be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints. The terms of reference for the Community Liaison Group will be developed in consultation with Wiltshire Council."* As such, any further updates to Requirement 4 would be duplicating the existing commitments. The Applicant refers to its response to Action Point 23 as set out in the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085]** which described the likely extent to which the CLG will be able to influence the detailed design of the Scheme. The Applicant acknowledges that these are limited, largely due to the Scheme itself being constrained by the **Works Plans [REP3-004]** and the parameters set out in the **Design Principles and Parameters [REP4-043]**. The detailed design itself is subject to approval by the relevant

ExQ	Respondent	Question	Applicant's Response
		should also consider the comments from the Council and Stop Lime Down and explain the expected role of community groups, individuals and Parish Councils and the potential role of a relationship manager.	planning authority under Requirement 5 of the **draft DCO [REP4-004]**, during which the Applicant would undertake informal consultation before submitting applications to discharge requirements, which provides an opportunity for the relevant planning authority to provide feedback on design matters. As part of that process, the Applicant considers there could be a mechanism where such discussions with Wiltshire Council could be communicated to the CLG. The Applicant confirms that ongoing discussions with Wiltshire Council (as documented through the **Statement of Common Ground [EN010168/APP/8.2]** (Revision 3) process) are sought to agree principles and an early draft example of terms of reference for the Community Liaison Group, ahead of being finalised pursuant to Requirement 4 in Schedule 2 to the **Draft DCO [REP4-004]**. The Applicant awaits Wiltshire Council's feedback on the example terms of reference, including its views on how principles from the Suffolk County Council Guidance could be incorporated in a way that is relevant to the post-consent phase of the Scheme. The Applicant confirms that the position of a 'relationship manager' (as described by Suffolk County Council's 2024 Community Engagement and Wellbeing

ExQ	Respondent	Question	Applicant's Response
			Supplementary Guidance Document) is actively being discussed as part of this process. See also the Applicant's response to question HW1.2 which covers overlapping matters with SE2.9.
SE2.10	The Applicant Wiltshire Council	**Innovation Forum** Wiltshire Council set out in its response to ExQ1 SE1.10 [REP3-142], how an 'Innovation Forum' could operate and suggested that it could form part of the CLG. The applicant noted the benefits of an Innovation Forum in its deadline 4 response [REP4-081] but suggested that opportunities for an Innovation Forum could be considered through the same forums used for the Community Benefit Fund (CBF). The ExA is mindful that the purpose of the CLG is to provide information on the state of works during key phases of the proposed development and provide a forum for concerns/ complaints to be raised and addressed. It is not clear that an	**Part 2** The Applicant acknowledges that the Crossrail model represents a benchmark for embedding innovation within major infrastructure projects. While the scale and technical complexity of a national railway differs from the Scheme, and a standalone governance structure equivalent to Crossrail's Innovate18 platform would be disproportionate and potentially burdensome for local volunteers, the Applicant identifies some core principles from the Crossrail approach that are directly applicable to the Scheme and reflect key areas raised in representations and through past consultations. • **Adaptive Design:** Just as the Crossrail model sought to incorporate emerging technologies throughout its delivery, the Scheme's design principles already mandate that it must be adaptable and able to respond to innovative new technologies. Though the principle technologies of Solar PV and Battery Storage would be present throughout the Scheme's operational lifetime,

ExQ	Respondent	Question	Applicant's Response
		Innovation Forum would sit comfortably within this operation given the potential community burden this could place on volunteers. <u>Wiltshire Council:</u> 1. You are asked to consider how, in practical terms, an Innovation Forum would operate as part of the CLG without adding further burden on volunteers, including Parish Councils. <u>The Applicant:</u> 2. The Council has provided an example of how the Innovation Forum could operate and cited the Crossrail Elizabeth Line governance and innovation in their responses to ExQ1 [REP3-142]. You are asked to consider if such an approach would be suitable for the proposed development and	emerging variances and opportunities are anticipated and could be particularly relevant when considering replacement activities. • **Knowledge Sharing**: The Applicant agrees that a formal mechanism for sharing advancements in solar PV efficiency, battery storage safety, and recycling techniques would provide long-term benefits as these have been referenced considerably by stakeholders. • **Supply Chain Collaboration:** IGP is already a signatory to the Solar Energy UK Supply Chain Commitment, mirroring Crossrail's focus on industry-wide standards and traceability. Transparency and updates on emerging policy and guidance would help inform those with concerns over supply chain and governance. To address the ExA's comments regarding the burden on community volunteers, the Applicant agrees that an Innovation Forum should not be a mandatory extension of the core CLG meetings. Instead, the Applicant proposes that innovation focused sessions could be delivered as periodic, optional technical briefings or as a specialist sub group within the CLG framework. This structure would ensure that the primary purpose of the

ExQ	Respondent	Question	Applicant's Response
		how it could be secured by the dDCO. Both Parties: 3. You are requested to add this point to the SoCG with the aim of reaching a consensus on how the Innovation Forum should be delivered.	CLG remains to manage construction phase queries and local impacts without distraction. By making innovation sharing an opt-in session, the Applicant can provide transparency on emerging design decisions to those with a technical interest without over burdening stakeholder groups such as Parish Councils or local residents who are primarily concerned with immediate site management. The Applicant therefore maintains that the most appropriate mechanism to secure such an arrangement during the pre-construction and construction phase is through the Terms of Reference for the Community Liaison Group, which are required to be submitted to and approved by the local planning authority under Requirement 4 of Schedule 2 to the **draft DCO [REP4-005]**. During the operational lifetime of the Scheme, when the Community Liaison Group is not active, the Innovation Forum will be continued as periodic, voluntary, opt-in stakeholder engagement sessions, facilitated by the committed community contact point within the site operation team. The Applicant considers that this could be secured through the **Outline Operational Environment Management Plan [REP4-051]** and **Outline Decommissioning**

ExQ	Respondent	Question	Applicant's Response
			Statement [REP3-096] by Requirements 14 and 20 respectively of Schedule 2 to the **Draft DCO [REP4-005]**. To facilitate discussions to finalise the Applicant and Wiltshire Council positions on the role and scope of the Innovation Forum, the mechanism for 'hand-over' outside periods when the CLG is active, and the relevant commitment or funding mechanism, an updated Outline Operational Environment Management Plan and Outline Decommissioning Strategy can be provided at Deadline 6. The Applicant has shared this response with Wiltshire Council in advance of D5 submission to aid progression on this matter. **Part 3** The Applicant confirms that the delivery and operation of the Innovation Forum has been added as a matter of discussion in the **Statement of Common Ground with Wiltshire Council [EXAM/8.2]**, which has been updated and submitted at Deadline 5. The Applicant awaits Wiltshire Council's response to Part 1 of this question so that further discussions can be undertaken from a point of both parties understanding more detail about the others position at this stage.

ExQ	Respondent	Question	Applicant's Response
SE2.11	Foxley Road Nurseries	**Seasonal Business Operations** Your post hearing submission [REP4-109] references that the business is 'extremely seasonal'. The ExA asks that you provide further details as to what is meant by this and if there are seasonal times when the avoidance of works affecting your business could be undertaken that would reduce the potential adverse effects arising from the proposed construction phase.	It is noted that this question is not directed to the Applicant. That notwithstanding, the Applicant refers to its response to **question SE2.2 above**, which sets out how the Applicant has considered and responded to concerns raised by Foxley Road Nurseries through the examination, and what relevant mitigation measures the Applicant has secured that would mitigate impacts to this business. The Applicant does not consider it likely that seasonal variation, either in respect to patrons at Foxley Road Nurseries or in respect of variation to onsite construction works, would material change the level of impact likely to be felt to this business.

2.17 Transportation, Traffic and Highway Safety

Table 2-17 Transportation, Traffic and Highway Safety

ExQ	Respondent	Question	Applicant's Response
TT2.1	The Applicant	**Construction Phase HGV Trip Generation** The ExA notes that the Transport Assessment was updated at deadline 1 [REP1-057 and REP1-059] to include new paragraphs 1.5.3 to 1.5.18 and Table 13-12 to provide further context and breakdown of HGV movement calculations for the construction phase. Specifically, paragraph 1.5.3 states: *To understand the number of HGV movements during the construction phase, trip generation has been calculated based on a first principles approach. This takes account of quantities of the following materials and activities required during the construction phase:* *• Number of Solar PV modules; • Number of Solar PV module mounting structures; • Volumes of waste; • Number of Skids and power stations; • Cable lengths within the Solar PV Sites; and • General activities,*	The Applicant confirms that the Solar PV module figure being used for its updated assessments is 842,000 modules. In response to the representations made by SLD and Wiltshire Council, the Applicant has reviewed the indicative design to establish the realistic maximum number of modules that could be installed within the Work No. 1(a) areas, which total 385.3ha as defined in **the Works Plan [REP3-004]**. This number is derived from an indicative high-density layout based on a 3-panel (3P) fixed-tilt configuration. This number is derived from an indicative high-density layout based on a 3-panel (3P) fixed-tilt configuration. The Applicant notes that the very large numbers in **SLD's Transport Assessment Annex D [REP1-172]**, which suggested over a million panels, were based on incorrect calculations.. The Applicant's maximum design scenario has a density of 2,186 panels per hectare (885 per acre). When assuming module outputs of 640W per panel currently being used on another IGP scheme currently undertaking detailed design at West Burton, this configuration results in 1.76 acres per MW. While more intensive than the typical range of 2 to 4 acres per MW referred to in NPS EN-3, it aligns with

ExQ	Respondent	Question	Applicant's Response
		including fencing, landscaping, compounds etc. A new Annex E was also provided to that document which provided a summary of the assumed components for construction of the solar PV sites. Part of that table is extracted and copied below: As can be seen from that table, the applicant assumed that a total of 588,988 solar PV panels would be installed on the sites and it is that number of panels which has informed the 1,200 HGV delivery figure. The ExA notes that this would roughly align with paragraph 7.10.11 of the Climate Change Chapter [APP-059], which stated that the total number of modules to be installed is expected to be 598,260. However, at deadline 3, the applicant's Climate Change Sensitivity Assessment Report [REP3-132], which in essence is a rebuttal to Wiltshire Council's and Stop Lime Down's written representations on climate change, stated that *a notional figure of approximately 842,000 panels has been*	paragraph 2.10.17, which states that densities will "*vary significantly depending on the site*" and are expected to change over time as technology continues to evolve to become more efficient. As requested, the Applicant has provided a comprehensive rebuttal to **SLD's revised HGV Trip Generation Report [REP4-132]** at Deadline 5. This submission includes the Applicant's estimated numbers for construction traffic movements and flow diagrams, presented in the same format and presentation as **pages 140 to 143 of [REP4-132]** to facilitate a direct comparison. The Applicant's rebuttal also includes a full response to the points raised by Wiltshire Council and SLD at ISH3 regarding Table 2 of **[REP1-172]**, which compares HGV delivery ratios across five other solar projects. This detailed narrative explains the technical and site-specific reasons for differences in delivery profiles and demonstrates how the Scheme remains within the range of established industry precedents. The updated trip generation calculations demonstrate that the number of deliveries remains a robust and reasonable worst-case assessment.

ExQ	Respondent	Question	Applicant's Response
		assumed, which reflects an estimated maximum achievable installed capacity of the Scheme within the defined design parameters. Further, in responding to Stop Lime Down's Transport submission at deadline 3 [REP3-133], the applicant suggested that up to 864,000 panels would be delivered if using high-cube containers (instead of regular containers) without increasing the number of HGV deliveries stated in the Transport Assessment (1,200). The ExA remains concerned that the applicant has underestimated the amount of solar PV panels required in its original assessments (and thus has not assessed the worst-case), and for transport issues specifically that it is either maintaining that the 1,200 deliveries associated with 588,988 modules would be no greater for 864,000 panels (and the associated increase in mounting structures), or alternatively relies upon the 50% buffer to account for under assessment. This was discussed to some extent at ISH3 in light of Stop Lime Down's notably	Trip generation calculations have been updated to provide more detail. It also demonstrates that the number of calculated deliveries is capable of delivering up to 842,000 panels if using High Cube Containers.

ExQ	Respondent	Question	Applicant's Response
		divergent HGV trip forecasts, but the matter is far from resolved. The ExA notes that there has been some recalculation provided by Stop Lime Down at deadline 4 [REP4 132], but a similar re-appraisal has not been undertaken by the Applicant. In light of the applicant's changing position on solar PV panel numbers during the examination, which is not reflected in its Transport Assessment, the ExA requires the applicant to: 1. Provide a comprehensive rebuttal to Stop Lime Down's revised HGV Trip Generation Report included in Appendix A [REP4 132]; and 2. Provide its version of the numbers included in Stop Lime Down's 'Assessment of Construction Traffic Movements' and 'Flow Diagrams' in pages 140 to 143 of [REP4 132], using the exact same format and presentation as Stop Lime Down in those pages so that direct comparison can be made.	

ExQ	Respondent	Question	Applicant's Response
		This request is in addition to the outstanding ISH3 Action Point 12 submission, which required a full response to the points raised by Wiltshire Council and Stop Lime Down at ISH3 and Table 2 of [REP1-172], which compares the ratios of HGV deliveries to the solar array areas for five other solar projects with the applicant's stated HGV delivery figures for solar panels and mounting structures for Lime Down.	
TT2.2	The Applicant	**Anticipated Replacement Deliveries** Table 13-42 in ES Chapter 13 [REP4-014], which is the same as Table 13-15 in the Transport Assessment [REP4-037] shows the anticipated replacement HGV deliveries during the operational phase. For the activity line for substation units/ cabling, the applicant notes that there would be 20 x 16.5m articulated vehicle substation units/ cabling deliveries for Lime Down A, C and E, and 60 deliveries for the 400kv substation in Lime Down D West, yet during construction there are zero deliveries listed for substation units/ cabling in Table 13-20 of ES Chapter	1. The Applicant makes note of this comment. The delivery of cabling and components associated with the 400kV substation during the construction phase has now been accounted for within the updated trip generation calculations included in the **Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission [EN010168/EXAM/9.64]** submitted at Deadline 5. 2. The difference between deliveries for replacement and construction for the BESS in Lime Down D West is due to how the figures were rounded in the calculations. For replacement, the numbers were rounded up to the nearest 10 rather than the nearest 5.

ExQ	Respondent	Question	Applicant's Response
		13 or the equivalent Table 13-12 in the Transport Assessment. 1. The applicant is asked to explain why there would be replacement deliveries for these components but not construction deliveries for these components. 2. In addition, for the BESS in Lime Down D West, there are 450 replacement deliveries noted in Table 13-42 of ES Chapter 13 or the equivalent Table 13-15 in the Transport Assessment, but only 445 deliveries are noted during construction in Table 13-20 of ES Chapter 13 or the equivalent Table 13-12 in the Transport Assessment. Can the applicant explain why there would be more deliveries associated with substation units/ cabling for the BESS area during replacement?	
TT2.3	The Applicant Wiltshire Council	**Outline Construction Traffic Management Plan Q1**	The Applicant confirms that a Traffic Management and Monitoring System (TMMS) will be implemented as stated in the **Outline CTMP [REP4-057].**

ExQ	Respondent	Question	Applicant's Response
		The ExA notes from the answer to first written question TT1.10 [REP3-128], that a traffic management and monitoring system will be considered, but then section 6.14.1 of the oCTMP [REP4-057] states that this system will be implemented. <u>The Applicant:</u> Can the applicant confirm which position is correct? 1. The applicant is also asked to explain how the construction delivery booking system is intended to operate and how it can guarantee that the chosen delivery contractors will have the appropriate technology to allow real time tracking of construction delivery vehicles? 2. What input could the local highway authority have on the type of traffic management and monitoring system employed?	1. As set out in the **Outline CTMP [REP4-057].** Suppliers and subcontractors will be required to book delivery slots via a secure online portal or app before arriving on-site to manage arrivals and departures. The system allows for tracking, allowing site managers to see when a vehicle is approaching or if it is delayed. A log will be kept as part of the booking system. 2. Wiltshire Council will be able to input and agree the type of TMMS when agreeing the final CTMPs. The final CTMPs, which must be substantially in accordance with the **Outline CTMP [REP4-057]**, are secured through Requirement 15 of Schedule 2 to the **Draft DCO [REP4-004]**. 3. As set out in the **Outline CTMP [REP4-057]**, further sanctions will be put into place for contractor failures to adhere to the Outline CTMP. This will include for possible fines and repeat offenders being dropped and not allowed to work on the Scheme. Details of these sanctions would be agreed with the local highway authority in the final CTMPs, which must be substantially in accordance with the **Outline CTMP [REP4-**

ExQ	Respondent	Question	Applicant's Response
		3. What enforcement mechanisms would be employed for contractor failures to adhere to the oCTMP? For example, the ExA considers that simple driver retraining for not following the dedicated routes seems like a light touch. 4. Paragraph 6.14.8 of the oCTMP states that the results of the delivery data monitoring will be reported by the applicant to the contractor to identify any issues which need to be resolved and any additional measures which should be implemented to prevent these from arising again. What reporting mechanism is there to the local highway authority, or is the applicant relying solely on the local highway authority to have to request a monitoring report? 5. The ExA is particularly interested in the applicant's approach towards adaptive management, for example should it become apparent that some	**057]** and are secured through Requirement 15 of Schedule 2 to the **Draft DCO [REP4-004].** 4. As set out in paragraph 16.14.9 of the **Outline CTMP [REP4-057]**. A record of monitoring data will be kept at all times by the Applicant and will be made available to the relevant local planning authorities and relevant highway authorities at their request to ensure compliance and to demonstrate that action is being taken where necessary. 5. As set out in paragraph 4.1.2 of the **Outline CTMP**, drivers will be required to follow the routes and will not be permitted to use any alternative routes. Should any of the routes become unavailable deliveries will be stopped until they are available again, unless a suitable alternative route is identified and agreed with the local highway authority. If holding locations are found to be frequently full the Applicant will need to implement adaptive measures within the Outline CTMP and provide/identify alternative holding areas. 6. Specific adaptive management commitments have been added to the Outline CTMP at deadline 5. Where necessary further

ExQ	Respondent	Question	Applicant's Response
		of the construction routes turn out to be problematic/ or not suitable, or the HGV holding locations shown on Figure 4.3 (particularly the smaller ones on the B4044/ B4039 for example) are frequently unavailable. The ExA notes that the oCTMP does not include any measures for liaising with the local highway authority or the local communities should unforeseen issues arise. 6. Explain why there are no adaptative management commitments included within the oCTMP? <u>Wiltshire Council:</u> Can Wiltshire Council advise what its position is on the traffic management and monitoring process (including adaptive management commitments)?	commitments can be agreed as part of the final CTMPs, which must be substantially in accordance with the **Outline CTMP [REP4-057]** and are secured through Requirement 15 of Schedule 2 to the **Draft DCO [REP4-004].**
TT2.4	The Applicant	**Outline Construction Traffic Management Plan Q2**	The Applicant makes note of this comment. The travel times between junction 17 and 18 and the scheme are all within 30 minutes travel time. Therefore, vehicles arriving 09:30 or departing at 16:30 will avoid travelling

ExQ	Respondent	Question	Applicant's Response
		ExQ1 TT1.11 asked National Highways to clarify whether deliveries to the proposed development through junctions 17 and 18 should take place after 09:30 and before 16:30 on weekdays (or some other times)? In its response [REP3-151], National Highways stated that due to existing levels of congestion, it is expected that no construction traffic would pass through junctions 17 and 18 of the M4 during the weekday morning (08:00-09:00) and evening (17:00-18:00) peak hours, therefore vehicles should not pass through these junctions until after 09:30 and before 16:30 on weekdays. This would logically mean that vehicles would be arriving on site later than 09:30 depending on the travel time from the M4 to the various site access points. The applicant is requested to review its oCTMP, particularly paragraphs 3.2.6 and section 3.4 to explicitly include the National Highways' requirement in relation to HGVs, as well as advise on any implications this may have on the construction timetable and the construction traffic flows on the local construction route network if these strict	through junctions 17 and 18 of the M4 during the identified weekday morning (08:00-09:00) and evening (17:00-18:00) peak hours. The **Statement of Common Ground with National Highways [REP2-030]** set out an agreed position on the proposed construction hours set out in the Outline CTMP and the timing restrictions to avoid peak traffic periods, which would mean that deliveries could use the junction before 09:30 but outside of the AM (08:00-09:00) and PM (17:00-18:00) peak hours. On this basis, the **Outline CTMP [REP4-057]** remains unchanged on this matter.

ExQ	Respondent	Question	Applicant's Response
		times to avoid junctions 17 and 18 are imposed.	
TT2.5	The Applicant	**Highway Improvement Works Q1** The ExA notes the inclusion of improved drawings within Appendix E of the oCTMP [REP4-057] and Annex I of the Transport Assessment [REP4-037] for highway improvement areas along Alderton Road and Fosse Way with annotations for the carriageway widths and areas of widening. However, details of the surface treatment for the widening areas is absent from the legend on the drawings and description of works in Table 7 of the oCTMP/ Table 13-20 of the Transport Assessment. Presumably if low lying grasses and edge of carriageway gravel are being removed to create passing bays, the widened area will need to be laid and finished with asphalt (or similar) to base course, binder course and surface course to match the adjoining highway. The applicant is asked to confirm and include the detail in Table 7 of the oCTMP/ Table 13-20 of the	The Applicant makes note of this comment. Further to submission at Deadline 5, details of the surface treatment for the widening areas is now included in the legend on the drawings and the description of works in Table 7 of the **Outline CTMP [EN010168/APP/7.22]** (Revision 5) and Table 13-20 of the **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 5) has been updated The widened areas will be laid and finished with asphalt to base course, binder course and surface course to match the adjoining highway.

ExQ	Respondent	Question	Applicant's Response
		Transport Assessment and on the relevant drawings.	
TT2.6	The Applicant	**Highway Improvement Works Q2** Following ExA questions at ISH3, the ExA appreciates the applicant updating the oCTMP [REP4-057] to confirm the extent of works required at the B4039 at The Gibb on Drawing No. PL404 in Appendix E, which is also noted in Table 7 of the oCTMP as location B4039 at the Salutation Inn, Castle Coombe. The updates state that the works include removal of existing vegetation on the inside corner (in front of the property known as Firs Farm). While the applicant confirmed at ISH3 that the vegetation is within the public highway and not part of the Firs Farm property, it is nonetheless seemingly maintained by that property. The ExA has read the applicant's response to ISH3 Action Point 2 relating to dialogue with Firs Farm [REP4-086] but this response suggests that the correspondence issued to Firs Farm to date is generic consultation/ project update material, and not specifically about the impacts on this	As the AP's land falls outside of the red line boundary, specific tailored engagement had not been undertaken until recently. The Applicant had previously notified the AP about statutory consultation through a s.48 notice distributed on the 2 June 2025 where they can find out more about the Project and discuss their interest with a member of the Project team. Following this, the Applicant has continued to provide Project updates to the AP through a number of written letters previously highlighted in ISH3 Action Point 2 **[REP4-086]**. Taking into account the comments received from the ExA, the Applicant has distributed a letter to the AP inviting them to a site specific meeting to discuss the Project and the potential impacts around their holding. As highlighted within the **Land and Rights Negotiations Tracker [REP4-008]** a license will be sought with this AP post consent, which will contain relevant and appropriate compensation procedures relating to damages incurred as a result of the Project works.

ExQ	Respondent	Question	Applicant's Response
		particular property and its curtilage. The ExA therefore seeks assurances that dialogue with the owners of that property has taken place on the matter of this vegetation removal to facilitate the highway improvement area (provide evidence of specific correspondence on this matter) and that the vegetation will either be reinstated, subject to the satisfaction of the owners of Firs Farm and highway authority approval, or the owner will be compensated.	
TT2.7	The Applicant	**Highway Improvement Works Q3** The ExA remains concerned about the lack of appraisal and commitment to possible highway improvement works on parts of the rural roads construction route network between the road east of Hullavington and Bradfield Cottages, particularly (but not limited to) the point where the road passes under the railway bridge in the direction of the Flying Monk Tap and Cafe. As observed by the ExA on its site inspections and as highlighted by Wiltshire Council at ISH3, this stretch of road currently offers no refuge, footway, or safe passing	Based on the information set out above, it remains the case that the number of pedestrian and cycle movements is not significant and the effect of the Scheme will not be material with regard to NMU delay, amenity, severity or safety. In accordance with ISEP Transport and Access guidelines, fear and intimidation is based on the following: • The total volume of traffic • The heavy vehicle composition • The speed vehicles are passing

ExQ	Respondent	Question	Applicant's Response
		place for vulnerable road users, creating dangerous conditions even under current traffic volumes. The ExA is seeking specific commentary on what options the applicant has considered for this section of road, and what if any safety improvements can be made. In addition, what construction period control or monitoring commitments could be considered for this stretch of road to ensure that it is under continuous safety assessment during the construction (and replacement) period?	In accordance with Tables 3.1, 3.2 and 3.3 in ISEP Transport and Access guidelines, the change in traffic flow and heavy vehicle composition from trips generated by the Scheme do not result in a step-change in the magnitude of fear and intimidation. For example, and in accordance with Table 3.2, the Level of Fear and Intimidation on Bradfield Cottages does not result in a step change for to the degree of hazard score when using the criteria presented in Table 3.1: • The total two-way traffic volume per hour (taken from average 18-hour traffic flows) will remain below 600 movements during the construction period • Total 18-hour heavy vehicle flow will remain below 1,000 during the construction period. • The average speed of vehicles is not anticipated to increase during the construction period As set out in the **Outline CTMP [REP4-057]**, and to raise awareness of Non-Motorised Users and appropriate driver behaviour, all construction

ExQ	Respondent	Question	Applicant's Response
			workers and delivery drivers, will be briefed prior to visiting the site. Temporary road signage will also be implemented along the designated routes to inform background traffic of the ongoing construction works and to direct construction traffic to and from the Site. This can include forewarning for the potential of non-motorised users using the carriageway particularly in the vicinity of PRoW joining the route. This is in recognition that, whilst the Scheme is not making the road more dangerous in EIA terms, it is appropriate to take the opportunity of using the CTMP to ensure safety is prioritised throughout the construction of the Scheme.
TT2.8	The Applicant	**Grittleton Crossroads AIL Swept Path** At ISH3 the ExA identified that there seemed to be no swept path drawing for AIL vehicles turning left at Grittleton Crossroads into Alderton Road, rather that the only drawing provided for this location showed a right hand turn at the crossroads towards Yatton Keynell or a left hand turn from Yatton Keynell onto the unnamed road back towards The Gibb. The applicant has subsequently stated in its post hearing note [REP4-086] that the *AIL swept path*	The applicant makes note of this comment. The specified AIL would not be able to take a left turn, so instead would turn right at the crossroads towards Yatton Keynell. For clarity, the AIL vehicle would have a tractor (cab) at either end, eliminating the need to pass alongside the waiting carrier. Sufficient turning space is provided at Grittleton Crossroads and the Neeld Court junction to allow the tractors to turn at the northern and southern end of the carrier respectively.

ExQ	Respondent	Question	Applicant's Response
		for Grittleton Crossroads is set out in Annex H of ES Volume 3, Appendix 13-1 Transport Assessment [REP3-065] (page 956). The plan referred to by the applicant is the same plan that the ExA was referring to at ISH3. It shows a 16 Axle Girder Frame Abnormal Load Carrier at Grittleton Crossroads but no swept path turning left into Alderton Road. The ExA can only assume that this AIL cannot take a left turn, so instead would have to turn right at the crossroads towards Yatton Keynell and unhitch the cab from the front-end and re-hitch at the back to enable the AIL vehicle to be able to proceed north along Alderton Road. If this is the case, the ExA would like this confirmed. Also, if this is the case, the ExA would like to understand where the cab would turn around to facilitate this procedure and whether there is sufficient width alongside the waiting carrier for the cab to pass alongside to enable re-hitching without any need for road widening in this location. Of course, if un-hitching and re-hitching is not intended, it remains that there is no	

ExQ	Respondent	Question	Applicant's Response
		swept path drawing for an AIL left turn at the Grittleton crossroads into Alderton Road, and one should be provided.	
TT2.9	The Applicant Wiltshire Council Stop Lime Down	**ISH3 Action Points 7 and 8** At ISH3, the ExA issued Action Point 7 to the applicant to provide a set of plans showing which parts of the construction route(s) would fail to meet the highway code requirements for passing non-motorised users (NMUs) with sufficient verge protection buffer, and/ or to provide a log of the locations and the length of those locations that would not provide sufficient passing space for each of the NMUs (with verge protection buffer) in line with the highway code. On page 19 of the applicant's written summary of oral submissions at ISH3 [REP4-086] the applicant records part of that discussion, noting that the *ExA directed the applicant for deadline 4 to identify areas where the road is not 5.5 metres wide on the plans, using a red box around those areas*. This is a slightly different version of the discussion, but nonetheless, at the top of	1. Drawing PL109B referred to in the Applicants ISH3 Note was referenced in error. Drawing numbers PL302, PL303, PL304, PL305, PL306 and PL309 instead intended to fulfil Action Point 7. 2. The topographical base within the drawings provided represent an accurate onsite measurement by means of theodolite in accordance with a detailed topographical highway specification provided by the Applicant to the survey company. This is the standard detailed method for measurement through which detailed highway design is undertaken. This method will be used when producing drawings for technical approval by Wiltshire Council. The applicant is undertaking further topographical surveys in locations where data is not currently shown at the request of the ExA. These include: • The southern section of Fosse Way, between Fosse Lodge and the corner of Aldterton Road;

ExQ	Respondent	Question	Applicant's Response
		page 20 of its post hearing note, the applicant then states that it has *provided additional plans in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 4) (Drawing PL109B) which shows the width of construction routes; and Appendix E in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 4) which includes proposed Highway Improvement Area Drawings for road widening and AIL movements*. The ExA notes that the citation to Drawing PL109B is incorrect as no such plan number is included in Annex I of the Transport Assessment [REP4-037], and similarly no such drawing number is provided in Appendix E of the oCTMP either [REP4-057]. Whilst the ExA notes that Drawing Nos. PL302, PL303, PL304, PL305, PL306 and PL309 included in Annex I of the Transport Assessment [REP4-037] appear to now show either passing bays and/ or dimensions of various parts of some of the construction routes, this is not strictly in accordance with ISH3 Action Point 7, although drawing	• The section of road between Fosse Way and Lime Down A; and • The section of road between Grittleton crossroads and the Gibb. Once the topographical survey is available, the drawings will be updated where required and submitted at Deadline 6.

ExQ	Respondent	Question	Applicant's Response
		numbers PL302, PL303 and PL304 appear to address ISH3 Action Point 8. The Applicant: 1. The applicant is requested to confirm whether another drawing specifically addressing Action Point 7, e.g. Drawing PL109B referred to in its ISH3 Note, should have been provided, or whether reference to that drawing is an error, with drawing numbers PL302, PL303, PL304, PL305, PL306 and PL309 instead intended to fulfil Action Point 7 2. The applicant is also requested to advise whether the existing road widths shown on the latest drawings referred to above were actually measured on site? Wiltshire Council and Stop Lime Down: 3. Advise whether drawing nos. PL302, PL303 and PL304 now provide sufficient dimensions and details to the satisfaction of the parties to demonstrate sufficient passing	

ExQ	Respondent	Question	Applicant's Response
		space on Alderton Road and the Fosse Way, in accordance with ISH3 Action Point 8. Comments on drawing numbers PL305, PL306 and PL309 are also welcomed. The ExA is particularly interested to understand if additional drawings, dimensions or annotations are still required (and why) (including whether colour-shaded route sections, as per Wiltshire Council's suggestion at ISH3 and its post hearing submission [REP4-092] remain necessary).	
TT2.10	The Applicant	**Fowlswick Lane, Access 109** Can the applicant explain why, if the AIL construction access route to the Fowlswick Lane compound is intended to come off the B4039, it intends to take access into the site from the north-eastern end of that field and not the south-western end, closer to the junction with the B4039? The ExA appreciates that the intent may be to use an existing field access (in the location of proposed access 109), however, as highlighted by Chippenham Without	Access to the Fowlswick Lane compound is intended to be taken form Fowlswick Lane at the north-eastern end of the field as shown on in **ES Volume 2, Figure 13-12 Construction Access Locations: Cable Route Corridor [APP-157]** and Drawing PL109 in **Annex D of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037].** To avoid the removal of hedgerow, the access can be managed by banksmen or traffic management measures to manage vehicles entering and existing the site. a. The HIA area wraps the north-eastern side of the compound and extends along Fowlswick Lane

ExQ	Respondent	Question	Applicant's Response
		Parish Council [REP4-094], the proposed opening in this location *would require considerable enlargement and metaling, as would the Fowlswick Lane itself, which would need to be widened down to the crossroads, and would require the removal of the mature hedgerow along the 200 metre length with verge, which could also have highway drainage implications.* In addition to the above question, and in light of the applicant's response to ISH3 Action Point 4 [REP4-086], which says that a *turning area for the whole AIL vehicle and trailer is not required as the AIL trailers are modular and on exit, the cab is unhitched from the front of the trailer and driven to the back of the trailer and hitched up, then drives off in forward gear*, the ExA seeks to understand a. why the HIA area wraps the north-eastern side of the compound and extends along Fowlswick Lane to Fowlswick Cottages (as shown on Figure 13-12-2 [APP-157]), and	to Fowlswick Cottages to include for potential traffic management measures at the access b. The full nature of highway improvement work in this location will relate to access works only shown in Drawing PL109 in **Annex D of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037].** This includes for a: 2.4m x 112.74m visibility splay to the south, based on a measured 85th percentile vehicle speed of 42.2mph. Existing vegetation to be trimmed/cut back so that the retained height is not greater than 600mm, plus a 6m wide access with bellmouth. The access is also proposed to be managed either though bankmen or other traffic management measures.

ExQ	Respondent	Question	Applicant's Response
		b. the full nature of the highway improvement works proposed in this location. The ExA expects substantially greater detail and explanation than that provided in Table 3 of the oCTMP and Table 13-11 of the Transport Assessment for access 109/ North of Fowlswick Lane.	
TT2.11	The Applicant	**Shuttle Bus Take-Up Q1** The ExA notes that within the construction worker travel plan, at Appendix C to the oCTMP [REP4-057], the applicant states that it is anticipated the majority of non-local construction workers will stay at local accommodation and be transported to Order limits by shuttle bus. At paragraph 3.2.10 of the oCTMP the applicant adds that for the purposes of the assessment, it has been assumed that 50% of workers will arrive by shuttle bus (or 622 workers, as detailed in Table 5 of the oCTMP). 1. Can the applicant explain what geographical area has been used to	1. As set out in paragraph 16-10.7 **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]**, non-local has been defined as locations that are 20km or more from the site. 2. The 50% figure is currently comprised of non-local workers. However, the shuttle bus will also be available for use by local workers living in local towns and settlements. • Assessments undertaken on the location and availability of local accommodation for non-local workers for the duration of the construction period are presented in **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]** and its supporting **ES Volume 3, Appendix 16-1: Socio Economics, Tourism and**

ExQ	Respondent	Question	Applicant's Response
		define local and non-local in this situation? 2. Can the applicant also confirm if the anticipated 50%/ 622 worker shuttle bus take-up is comprised of only non-local workers staying in local accommodation, or if those figures also include a proportion of local workers who may also wish to use the shuttle service? If the latter, please provide the proportional split between local and non-local workers anticipated in the 50%/ 622 worker take up figures. 3. Advise what assessments have been undertaken on the location and availability of local accommodation for non-local workers for the duration of the construction period and present this evidence.	**Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240].** This has been limited to identifying the total serviced accommodation stock within the 20 km Study Area (based on 2016 Visit Britain Accommodation Stock Audit), and regional occupation rates for accommodation (Visit Britain, 2025), to give a high-level rate of availability. A similar approach to identify the total rates of vacant rental properties (MHCLG English Housing Survey Headline Report, 2023-24) was taken to identify alternative provision. This therefore covers accommodation space in major urban locations such as Chippenham, Bath, north Bristol and Swindon, all of which are located within a commutable distance of the Scheme. The Applicant has not undertaken any further detailed assessment at this stage, as understanding accommodation need will need to be determined at the detailed design and Requirement discharge stage to account for: • detailed construction timetabling and worker requirements; and

ExQ	Respondent	Question	Applicant's Response
			• an up-to-date understanding of cumulative construction project accommodation need, which can only be accurately determined when construction is due to commence.
TT2.12	The Applicant	**Shuttle Bus Take-Up Q2** In response to ExQ1 TT1.8, Wiltshire Council [REP3-142] noted that at the project's scoping stage it advised the applicant that a 50% worker take-up rate for the shuttle bus was high and would prefer to see a lower shuttle bus assumed mode share of say 20%. The applicant ignored the Council's scoping opinion on this matter and the ExA's own request in ExQ1 TT1.8 to provide assurance that the figures underpinning the applicant's Transport Assessment are realistic. However, as confirmed by the applicant's transport expert at ISH3, actual traffic information (rather than modelled or assumed) from other similar solar schemes (such as Cleve Hill) is not publicly available, therefore assumptions have to be made. The ExA's view, nonetheless, is that by	Whilst the shuttle bus will be available for all workers it is expected that it will primarily serve the inbound workers (estimated 59.5% of the peak workforce) who will be accommodated in known locations in larger groups and suitable pick up and drop off shuttle bus points can be easily arranged. Examples of percentage shuttle bus use for consented DCO solar farms include: • Gate Burton – at post decision stage – 55% shuttle bus • Beacon Fen Energy Park – in examination – 55% • Tillbridge Solar Project – post decision stage – 47% • Stonestreet Green Solar – post decision stage – 75% • Longfield Solar Farm – post decision stage – 55%

ExQ	Respondent	Question	Applicant's Response
		assuming such a high shuttle bus take-up rate, the applicant may not have assessed a 'worst case' traffic loading on local roads. The applicant is requested to advise how the 50% take-up rate is the worst-case assessment, and as asked in ExQ1 TT1.8, the ExA wishes to understand how the applicant intends to deal with low shuttle bus uptake if it arises?	• Cleve Hill Solar Farm – Delivered – 100% Based on the above, the assumption of 50% shuttle bus usage is justified, with potential for shuttle bus usage to be higher, and for it to also serve local workers. The shuttle bus will be managed through measures set out in the Construction Worker Travel Plan, which will form part of the Final CTMP. This will include details on pick-up and drop-off locations and limits placed on on-site contractor parking provision.
TT2.13	The Applicant	**Construction Phasing** Table 1 of the oCTMP [REP4-057] shows the construction of the 400kV substation being constructed in the first 6 months of the construction programme. The applicant noted in paragraph 2.1.30 of its deadline 3 response to Stop Lime Down [REP3-133] that whilst this is subject to change, this period was selected to represent the realistic worst case scenario for assessment as it provides a higher peak value than spreading trips across a two year period. Nonetheless, Stop Lime Down has noted in its deadline 4 submission [REP4-132] that at a meeting between the applicant and Stop Lime Down on 23 June 2026, the applicant's transport	As requested, the Applicant has provided a rebuttal to Stop Lime Down's revised HGV Trip Generation Report in the **Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission [EN010168/EXAM/9.64]** submitted at Deadline 5. This includes the Applicant's version of the numbers included in Stop Lime Down's 'Assessment of Construction Traffic Movements' and 'Flow Diagrams' in pages 140 to 143 of Stop Lime Down's Post Hearing Submission **[REP4-132]**, using the exact same format and presentation as Stop Lime Down in those pages so that direct comparison can be made. The updated calculations now account for a 20-month timescale for the 400kV substation construction. The result of this means that peak flows of HGVs and light

ExQ	Respondent	Question	Applicant's Response
		expert conceded that the timescale for the 400kV substation construction would likely be similar to the BESS, around 2 years, which means that the 400kV substation would be constructed concurrently with Lime Down D and E and the BESS. As identified by the ExA in ExQ1 TT1.7 the ExA is already concerned about the applicant's distribution of construction worker numbers proportionally across the solar PV sites in the transport assessment, for as has been identified by other IPs, the 400kV substation and the BESS, which are both in Lime Down D, are likely to attract well above the average number of workers for the solar sites. Therefore, the applicant is asked to explain the implications of an elongated substation construction period in terms of daily and peak flows of HGVs and light vehicle construction traffic from Dyson Roundabout to Bradfield Cottages, including the chances of HGVs meeting on that road.	vehicle construction traffic from Dyson Roundabout to Bradfield Cottages are lowered as a result (from 56 to 54 movements) even when including the uplift in movements set out within the trip generation calculations presented in the Technical Note. The chances of HGVs meeting on the road is also slightly lowered as a result. No significant effects were identified from the compressed timescale, therefore there are no concerns from lower peak and average traffic flows over a longer period within the two-year construction phase
TT2.14	The Applicant	**ES Appendix 13-1** At ExQ1 the ExA highlighted an issue with the page numbering and lack of hyperlinks	The Applicant makes note of this comment and has updated hyperlinks and page numbers in **ES Volume 3, Appendix 13-1: Transport Assessment**

ExQ	Respondent	Question	Applicant's Response
		within the contents page of the document to the relevant Annexes, which is problematic in a 1000 page document. The document was updated at deadline 3 and the issues corrected. However, the subsequent update to the document at deadline 4 again lacks hyperlinking to the Annexes from the contents page, while the tracked version [REP4-038] lacks both hyperlinking and correct page numbers on the contents page. The applicant is required to ensure that any subsequent iterations of the document (clean and tracked) are correct and hyperlinks are inserted. This particular issue should be checked in all application documents (not just the transport assessment) submitted for deadline 5 and later deadlines	**[EN010168/APP/6.3]** (Revision 5) for the deadline 5 submission. All other documents submitted at Deadline 5 have been checked.

Annex A CH2.14 Heritage Wirelines

Lanpro

Lime Down Solar Park

Illustrative Wireframe Views

August 2026



Viewpoint 01 - Existing View

Drawing Ref:	VP01-from Bradfield Manor
Taken on:	22.05.2025
Weather:	Overcast

Photograph

Camera & lens:	Nikon D610 FFS, 50mm
Camera Height:	1.5m
Direction of view:	Looking east towards site
Approximate distance to site:	750m

Viewing Instructions - For correct perspective viewing, this image should be printed at A3 and viewed at a distance of 500 mm (arms distance). The image should be assessed in the field from the same viewpoint location. This visualisation is for illustrative purposes only.

Lime Down Solar Park



Viewpoint 01 - Illustrative Wireframe

Drawing Ref:	VP01-from Bradfield Manor
Taken on:	22.05.2025
Weather:	Overcast

Photograph

Camera & lens:	Nikon D610 FFS, 50mm
Camera Height:	1.5m
Direction of view:	Looking east towards site
Approximate distance to site:	750m

Viewing Instructions - For correct perspective viewing, this image should be printed at A3 and viewed at a distance of 500 mm (arms distance). The image should be assessed in the field from the same viewpoint location. This visualisation is for illustrative purposes only.

Lime Down Solar Park



Viewpoint 02 - Existing View

Drawing Ref:	VP02-from Bradfield Manor
Taken on:	22.05.2025
Weather:	Overcast

Photograph

Camera & lens:	Nikon D610 FFS, 50mm
Camera Height:	1.5m
Direction of view:	Looking north towards site
Approximate distance to site:	180m

Viewing Instructions - For correct perspective viewing, this image should be printed at A3 and viewed at a distance of 500 mm (arms distance). The image should be assessed in the field from the same viewpoint location. This visualisation is for illustrative purposes only.

Lime Down Solar Park



Viewpoint 02 - Illustrative Wireframe

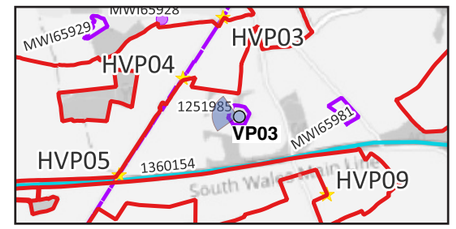
Drawing Ref:	VP02-from Bradfield Manor
Taken on:	22.05.2025
Weather:	Overcast

Photograph

Camera & lens:	Nikon D610 FFS, 50mm
Camera Height:	1.5m
Direction of view:	Looking north towards site
Approximate distance to site:	180m

Viewing Instructions - For correct perspective viewing, this image should be printed at A3 and viewed at a distance of 500 mm (arms distance). The image should be assessed in the field from the same viewpoint location. This visualisation is for illustrative purposes only.

Lime Down Solar Park





Viewpoint 03 - Existing View - Left

Drawing Ref: VP03-from Farleaze Farm
Taken on: 31.07.2026
Weather: Clear, good visibility

Photograph
Camera & lens: Nikon D610 FFS, 50mm
Camera Height: 1.5m
Direction of view: Looking west towards site
Approximate distance to site: 420m

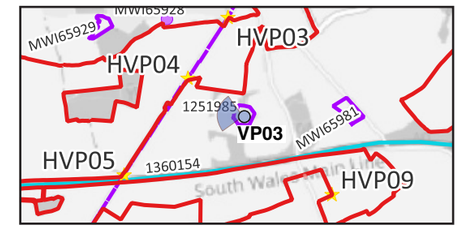
Viewing Instructions - For correct perspective viewing, this image should be printed at A3 and viewed at a distance of 500 mm (arms distance). The image should be assessed in the field from the same viewpoint location. This visualisation is for illustrative purposes only.



Viewpoint 03 - Existing View - Right

Drawing Ref: VP03-from Farleaze Farm
Taken on: 31.07.2026
Weather: Clear, good visibility

Photograph
Camera & lens: Nikon D610 FFS, 50mm
Camera Height: 1.5m
Direction of view: Looking west towards site
Approximate distance to site: 420m





Viewpoint 03 - Illustrative Wireframe - Left

Drawing Ref: VP03-from Farleaze Farm
Taken on: 31.07.2026
Weather: Clear, good visibility

Photograph
Camera & lens: Nikon D610 FFS, 50mm
Camera Height: 1.5m
Direction of view: Looking west towards site
Approximate distance to site: 420m

Viewing Instructions - For correct perspective viewing, this image should be printed at A3 and viewed at a distance of 500 mm (arms distance). The image should be assessed in the field from the same viewpoint location. This visualisation is for illustrative purposes only.



Viewpoint 03 - Illustrative Wireframe - Right

Drawing Ref: VP03-from Farleaze Farm
Taken on: 31.07.2026
Weather: Clear, good visibility

Photograph
Camera & lens: Nikon D610 FFS, 50mm
Camera Height: 1.5m
Direction of view: Looking west towards site
Approximate distance to site: 420m



Viewpoint 03 - Existing View
Full Frame

Drawing Ref:	VP03-from Farleaze Farm
Taken on:	31.07.2026
Weather:	Clear, good visibility

Photograph

Camera & lens:	Nikon D610 FFS, 50mm
Camera Height:	1.5m
Direction of view:	Looking west towards site
Approximate distance to site:	420m

Viewing Instructions - For correct perspective viewing, this image should be printed at A3 and viewed at a distance of 500 mm (arms distance). The image should be assessed in the field from the same viewpoint location. This visualisation is for illustrative purposes only.

Lime Down Solar Park



Viewpoint 03 - Illustrative Wireframe Full Frame

Drawing Ref:	VP03-from Farleaze Farm
Taken on:	31.07.2026
Weather:	Clear, good visibility

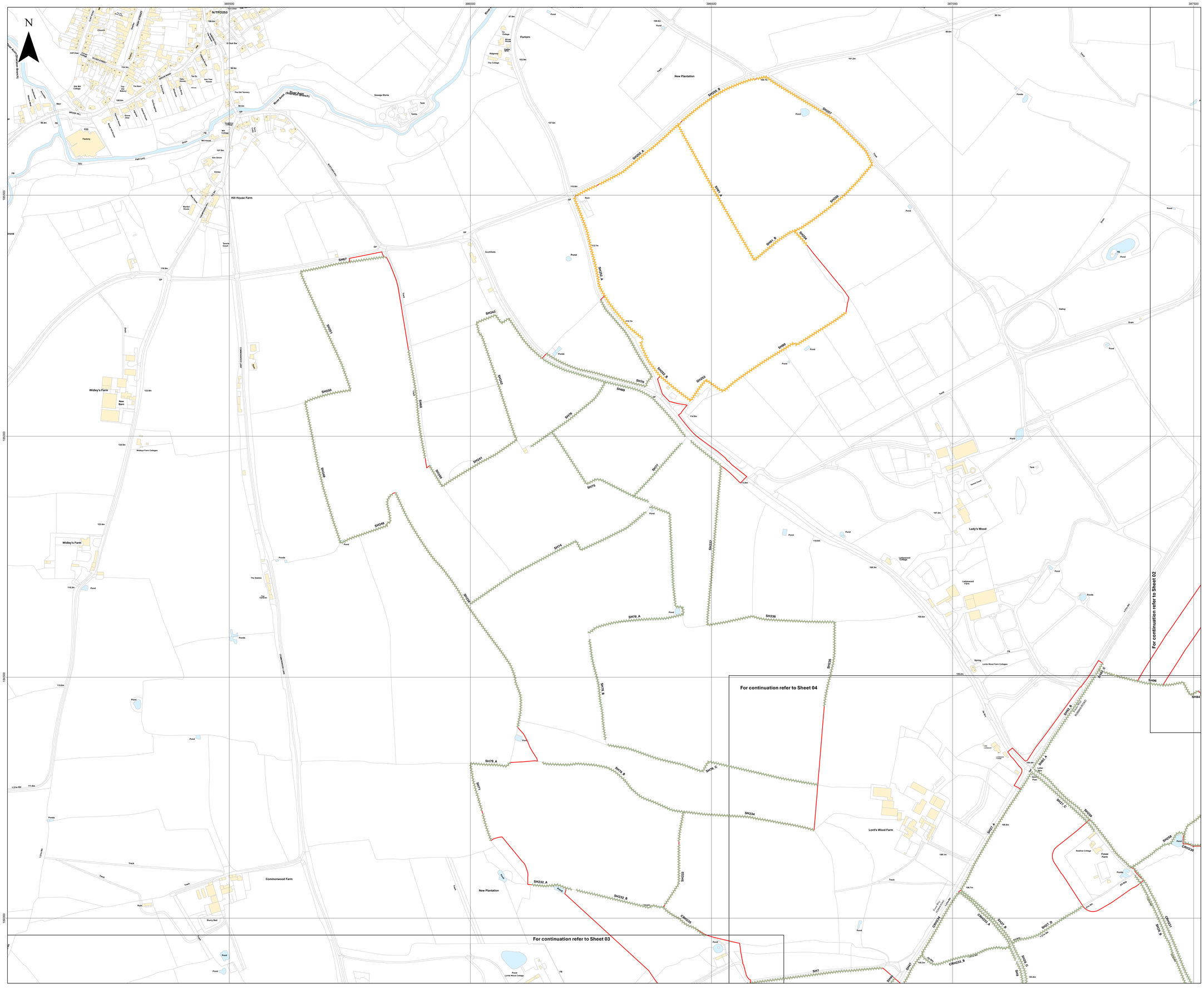
Photograph

Camera & lens:	Nikon D610 FFS, 50mm
Camera Height:	1.5m
Direction of view:	Looking west towards site
Approximate distance to site:	420m

Viewing Instructions - For correct perspective viewing, this image should be printed at A3 and viewed at a distance of 500 mm (arms distance). The image should be assessed in the field from the same viewpoint location. This visualisation is for illustrative purposes only.

Lime Down Solar Park

Annex B EB2.7 Hedgerow Height Plan



Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height
- Hedgerows to be managed at c1.5m (or as existing if greater)
- Tree Preservation Order (TPO)

Layers: Lanpro, 2026; IGP, 2026

Base map: Reproduced from Ordnance Survey digital map data © Crown copyright 2026. All rights reserved. License number 0100031673

0 100 200 300 Metres

Scale: 1:2,500@ A0

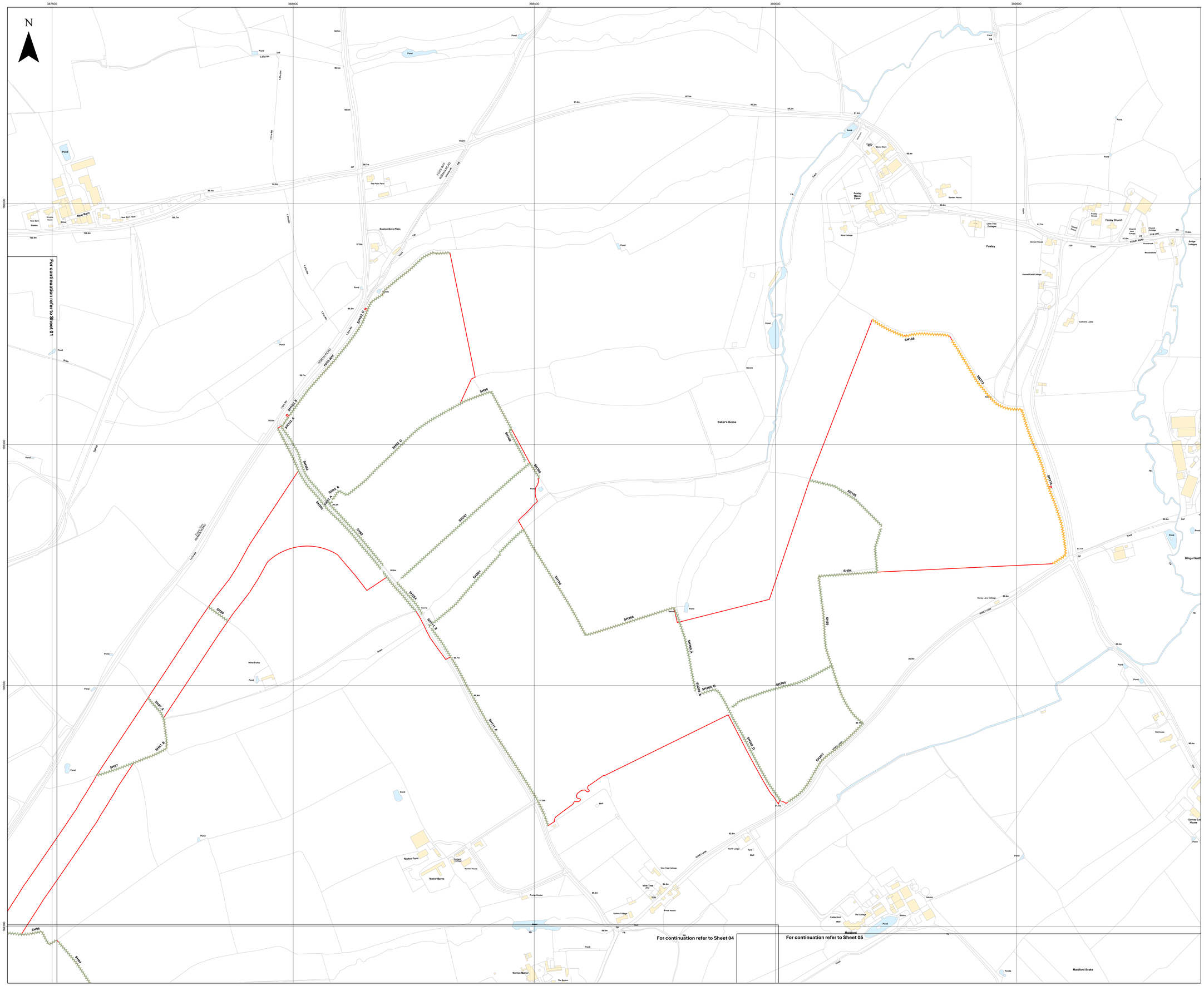
APFP Regulation: 5(2)(o)	Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 1 of 23

Revision B

Lime Down Solar Park



Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height
- Hedgerows to be managed at c1.5m (or as existing if greater)

Layers: Lanpro, 2026; IGP, 2026

Base map: Reproduced from Ordnance Survey digital map data © Crown copyright 2026. All rights reserved. License number 0100031673

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Scale: 1:2,500@ A0

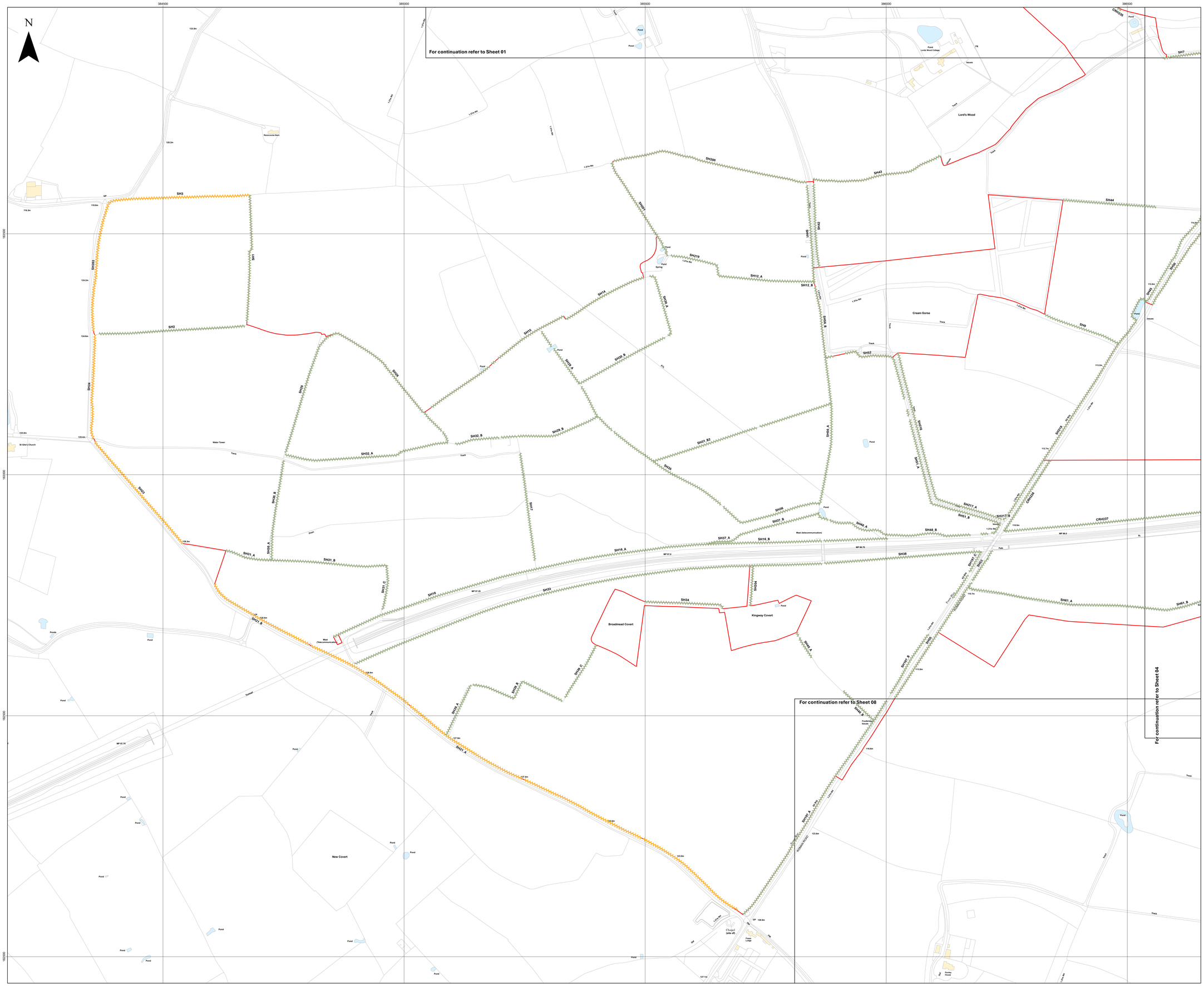
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Drawn by: BH	Checked by: JB

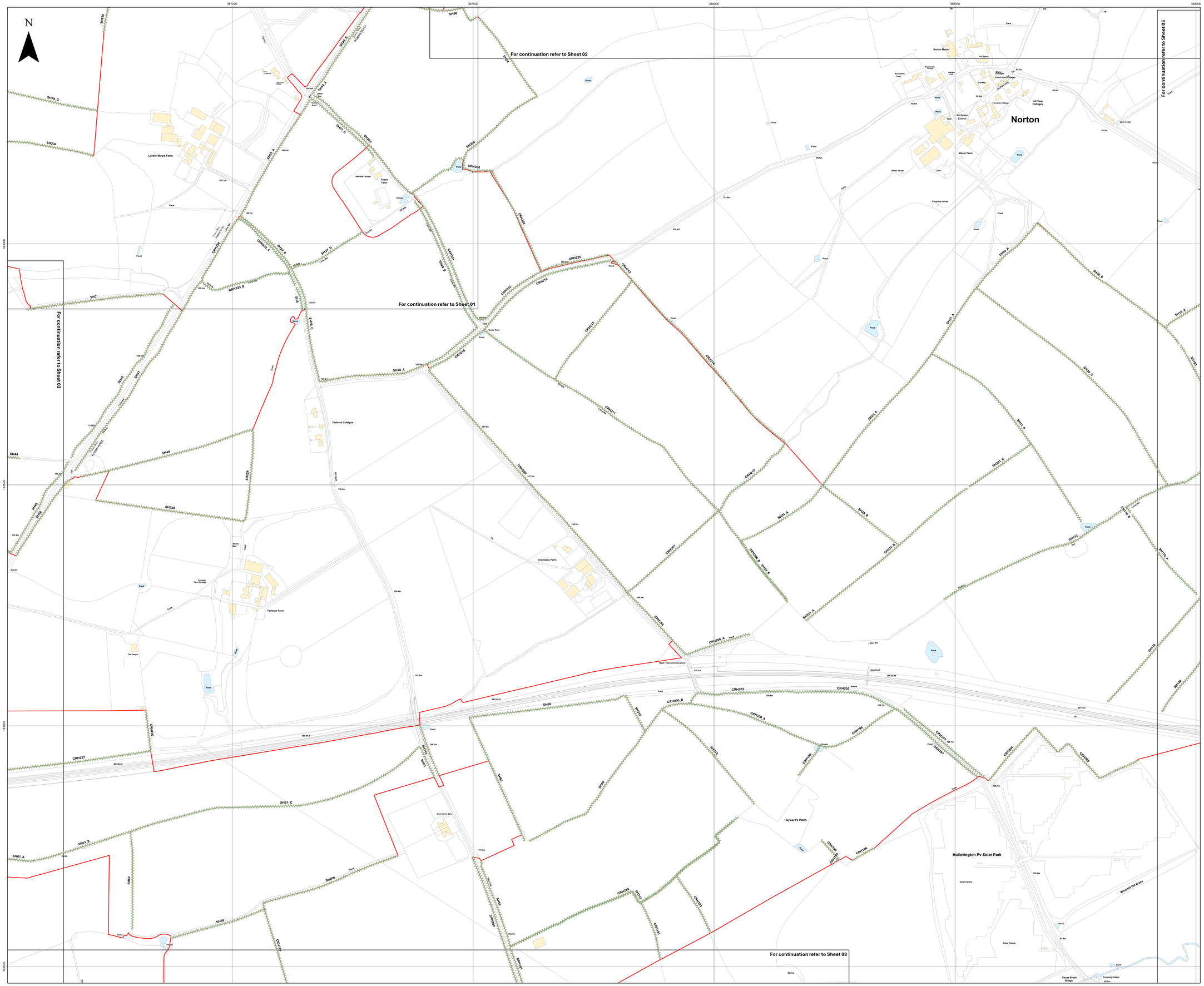
Hedgerow Height Plan

Sheet 2 of 23

Revision B

Lime Down Solar Park


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For continuation refer to Sheet 01
For continuation refer to Sheet 08
For continuation refer to Sheet 04
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SH3_B
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SH23_A
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SH25_A
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SH26_A
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SH29_A
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SH31_C
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SH257



Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height

Layers: Lanpro, 2026; IGP, 2026
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0 100 200 300 Metres

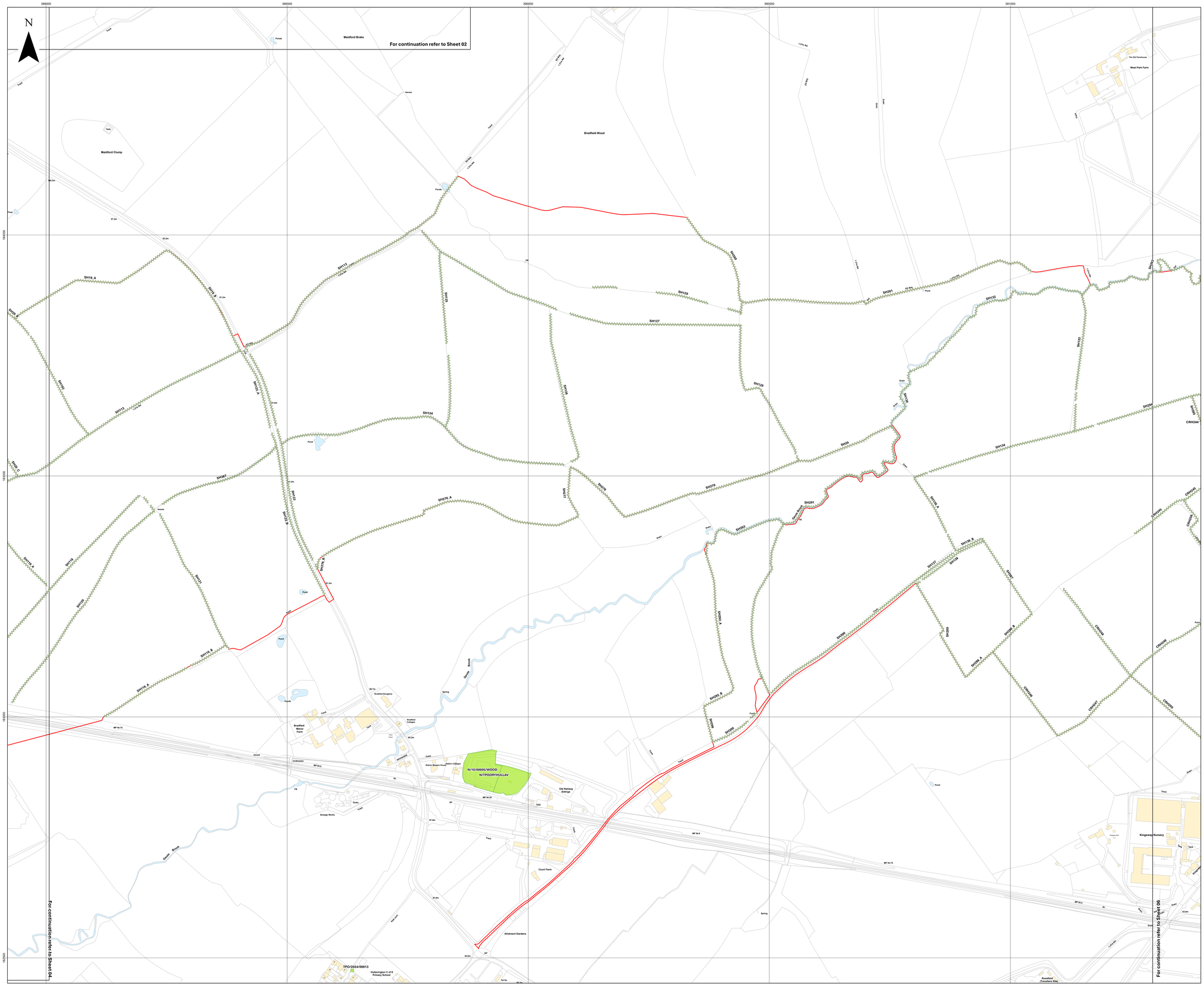
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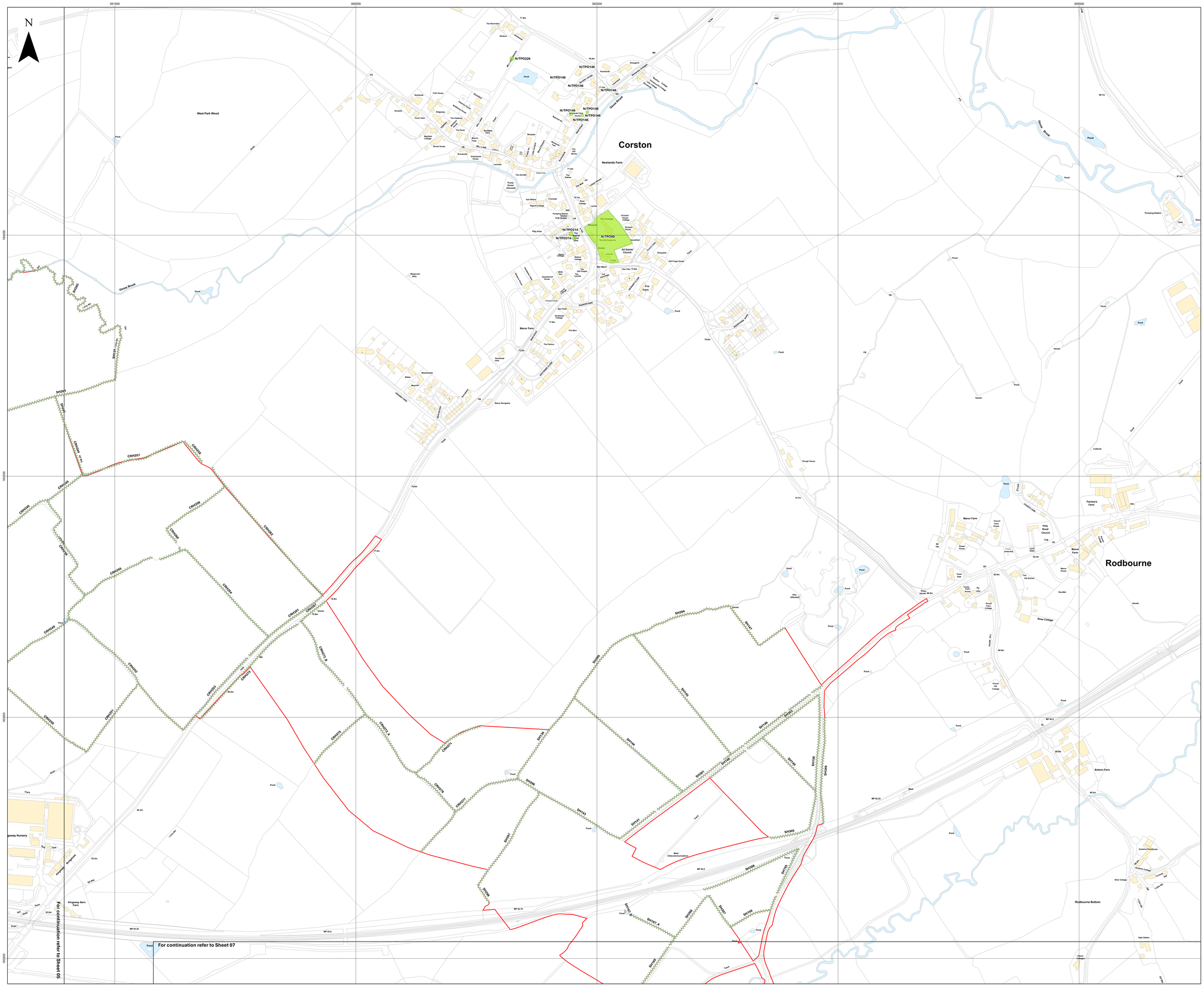
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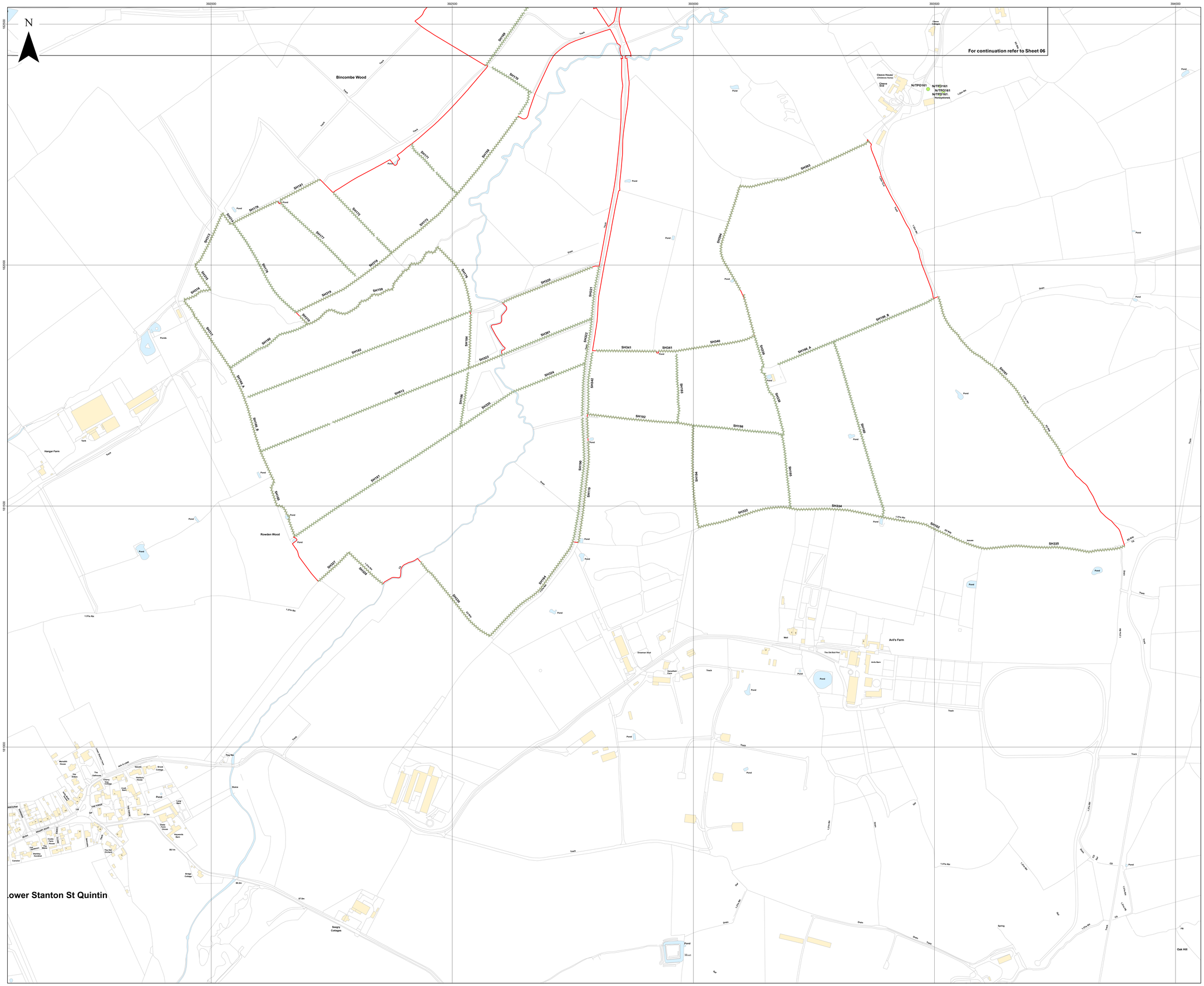
Hedgerow Height Plan

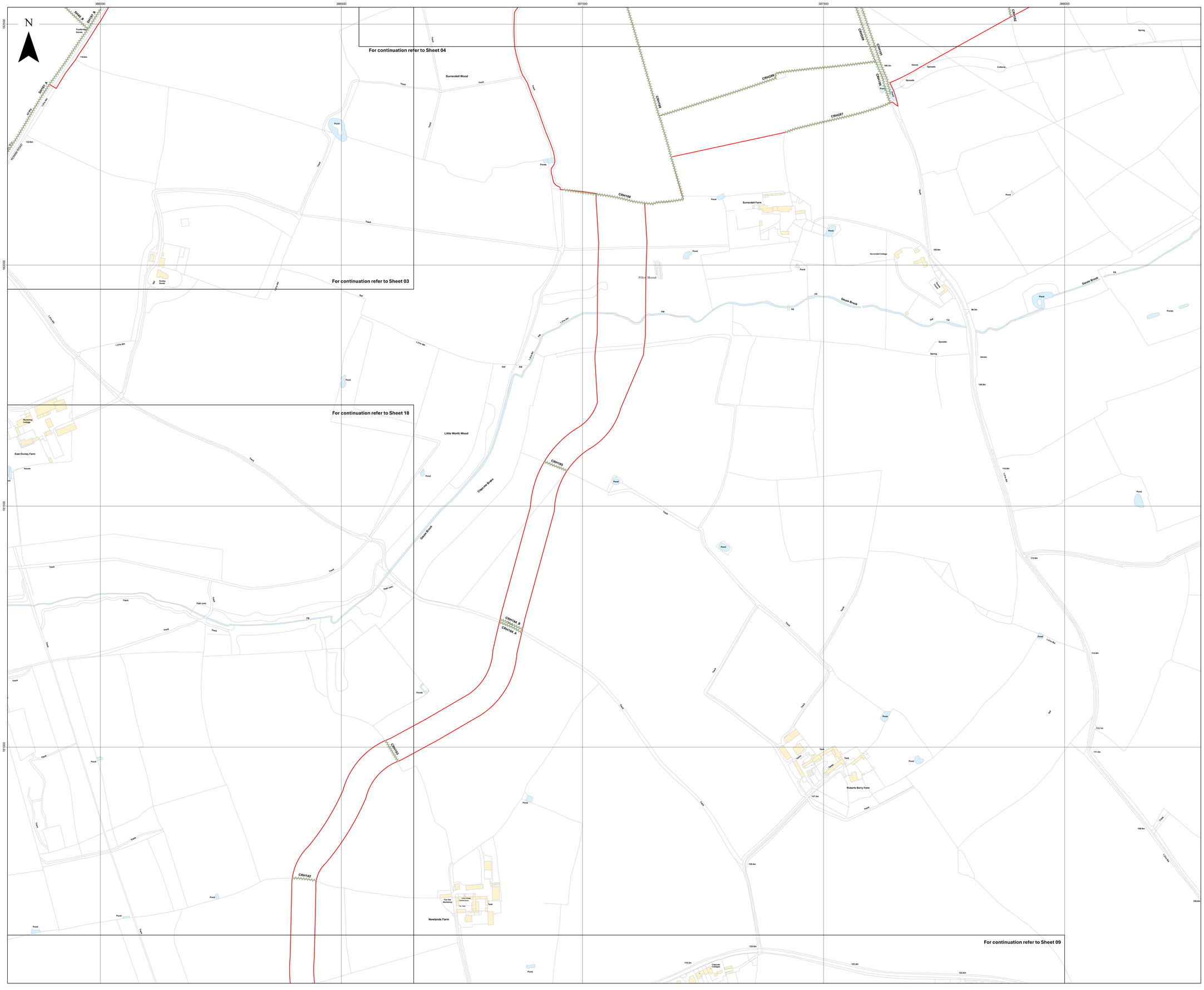
Sheet 4 of 23
Revision B

Lime Down Solar Park


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For continuation refer to Sheet 04
For continuation refer to Sheet 06
Maidford Brake
Maidford Clump
Bradfield Wood
The Old Farmhouse
West Park Farm
Bradfield Manor Farm
Bradfield Bungalow
Bradfield College
Station Keepers House
Station Cottages
Old Railway Sidings
Court Farm
Allotment Gardens
Hullavington C of E Primary School
Kingsway Nursery
Rosefield (Travellers Site)
Sewage Works
Gauze Brook
Grittleton Brook
N/15/00005/WOOD
N/TPO/ORYHULLAV
TPO/2024/00013
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Rodbourne Bottom
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For continuation refer to Sheet 06
Bincombe Wood
Rowden Wood
Lower Stanton St Quintin
Axil's Farm
Clavere House
Clavere Cottages
Hangar Farm
Ponds
Pond
Track
Path
Drain
Stream
Tank
Spring
Well
Sluice
Pegg Bay
Seagry Cottages
Oak Hill
Mount
Drewmen Stud
Dewsfield Farm
The Old Bull Pen
Axils Barn
Meredith House
The Elders
The Dolhouse
Cherry Tree Cottage
Yatsura
Brook Cottage
Hembury House
Cook Barn
Lime Kiln
Glebe Farm House
Haywards Barn
Bridge Cottage
Crofts Farm House
The Manor
The Old Orchard
Bletchley Hombrey
Chestnut
Ivy Cottage
Ivy Lodge
Old Vicarage
Old Rectory
Old Forge
Old Chapel
Old Post Office
Old Stables
Old Cottage
Old Barn
Old Farm
Old Manor
Old Mill
Old Bridge
Old Church
Old Hall
Old House
Old Inn
Old Pub
Old Shop
Old School
Old Village
Old Well
Old Yard
Old Gate
Old Path
Old Road
Old Track
Old Wall
Old Water
Old Wood
Old Field
Old Meadow
Old Pasture
Old Orchard
Old Garden
Old Lane
Old Bridge
Old Ford
Old Crossing
Old Junction
Old Roundabout
Old Traffic Lights
Old Zebra Crossing
Old Pelican Crossing
Old Puffin Crossing
Old Toucan Crossing
Old Pedestrian Crossing
Old Cycle Crossing
Old Bridleway
Old Footpath
Old Public Right of Way
Old Permissive Path
Old Access Land
Old Common Land
Old Village Green
Old Allotments
Old Recreation Ground
Old Playing Field
Old Sports Ground
Old Golf Course
Old Cricket Ground
Old Football Ground
Old Rugby Ground
Old Tennis Court
Old Swimming Pool
Old Leisure Centre
Old Community Centre
Old Village Hall
Old Church Hall
Old Chapel Hall
Old School Hall
Old Scout Hall
Old Guide Hall
Old Youth Club
Old Day Centre
Old Nursing Home
Old Residential Home
Old Sheltered Housing
Old Retirement Housing
Old Extra Care Housing
Old Supported Housing
Old Affordable Housing
Old Social Housing
Old Council Housing
Old Housing Association
Old Private Housing
Old Market Housing
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Old Pelican Crossing
Old Puffin Crossing
Old Toucan Crossing
Old Pedestrian Crossing
Old Cycle Crossing
Old Bridleway
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Old Public Right of Way
Old Permissive Path
Old Access Land
Old Common Land
Old Village Green
Old Allotments
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Old Playing Field
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Old Golf Course
Old Cricket Ground
Old Football Ground
Old Rugby Ground
Old Tennis Court
Old Swimming Pool
Old Leisure Centre
Old Community Centre
Old Village Hall
Old Church Hall
Old Chapel Hall
Old School Hall
Old Scout Hall
Old Guide Hall
Old Youth Club
Old Day Centre
Old Nursing Home
Old Residential Home
Old Sheltered Housing
Old Retirement Housing
Old Extra Care Housing
Old Supported Housing
Old Affordable Housing
Old Social Housing
Old Council Housing
Old Housing Association
Old Private Housing
Old Market Housing
Old Self Build
Old Custom Build
Old Plot
Old Site
Old Development
Old Scheme
Old Proposal
Old Application
Old Consent
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Old Inquiry
Old Hearing
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Old Limits
Old Boundary
Old Fence
Old Hedge
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SH169
SH170
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Honeystones
1.37m Bk
1.37m Bk
1.37m Bk



Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height

Layers: Lanpro, 2026; IGP, 2026
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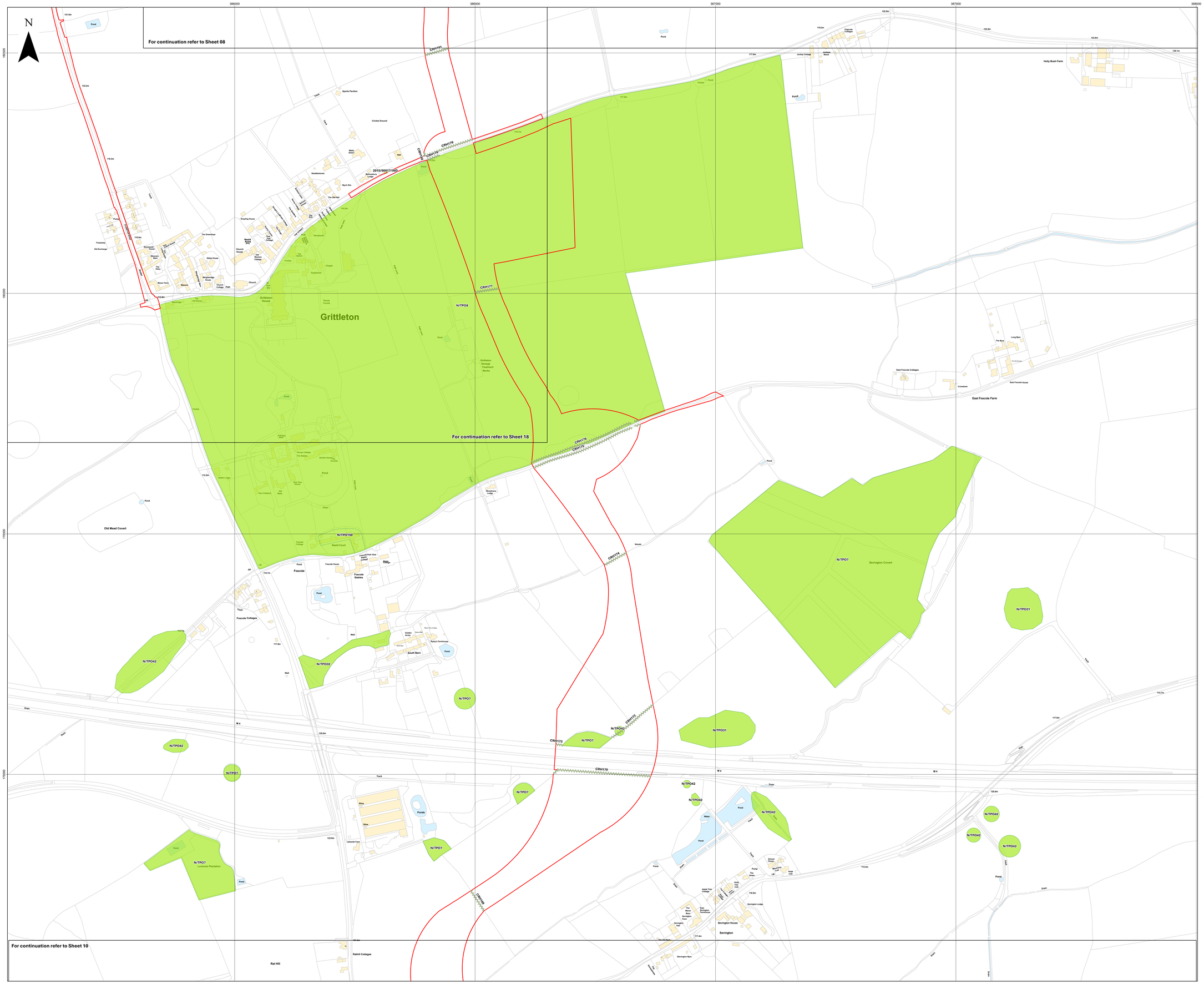
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APFP Regulation: 5(2)(o)	Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 8 of 23
Revision B

Lime Down Solar Park



Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height
- Tree Preservation Order (TPO)

Layers: Lanpro, 2026; IGP, 2026
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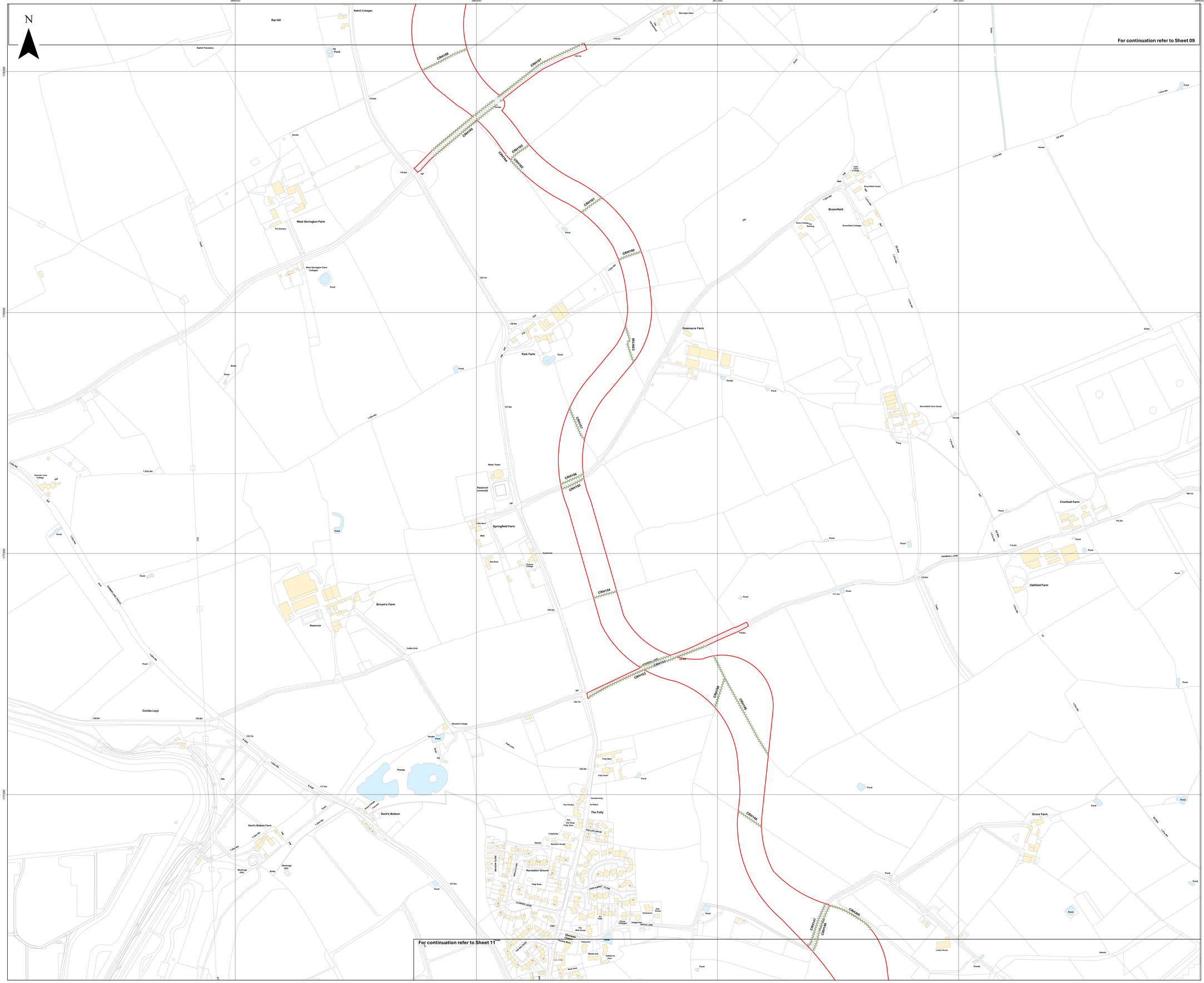
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APFP Regulation: 5(2)(o)	Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 9 of 23
Revision B

Lime Down Solar Park



Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height

Layers: Lanpro, 2026; IGP, 2026

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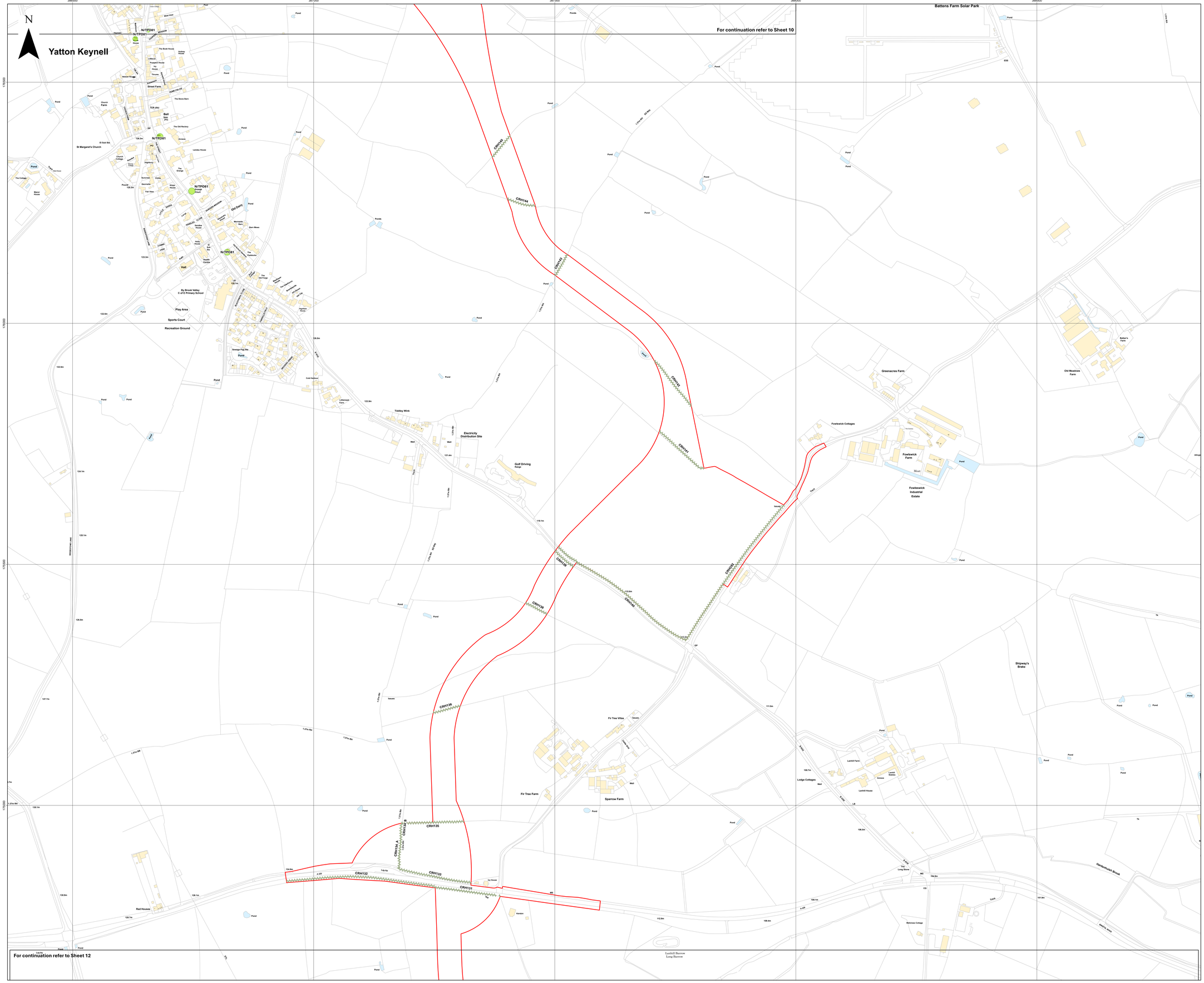
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 10 of 23

Revision B

Lime Down Solar Park



Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height
- Tree Preservation Order (TPO)

Layers: Lanpro, 2026; IGP, 2026
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Scale: 1:2,500@ A0

APFP Regulation: 5(2)(o)	Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 11 of 23

Revision B

Lime Down Solar Park

386500 387000 387500 388000 388500

175500 175000 174500

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For continuation refer to Sheet 11

For continuation refer to Sheet 13

CRH130 CRH129 CRH128 CRH127 CRH125 CRH126 CRH122 CRH121 CRH120 CRH119 CRH118 CRH117 CRH116

Lanhill Barrow
Long Barrow

Lan Hill
Lanhill Clump
Smith's Plantation
Lanhill Brake
Fagot Heath
Corsham Wood
Sheldon Wood
Fox Covert
The Privet
Chapscroft Wood
Bushy Barrow
Allotment Gardens
Play Area
Pool Farm
Stables
Ridgeborne Manor
Sheldon Manor
Sheldon Farm
Starvall Farm
The Fennels

CHIPPENHAM LANE

Reservoir (covered)
Cattle Grid
Track
Sewage Pumping Station
Brook House
Manor Cottage

Pond
Ponds
Well
Ford
FB
GP
Def
Trod
Ditch
Culvert
Collects
Issues
Holy Well
Issues

Layers: Lanpro, 2026; IGP, 2026
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Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height

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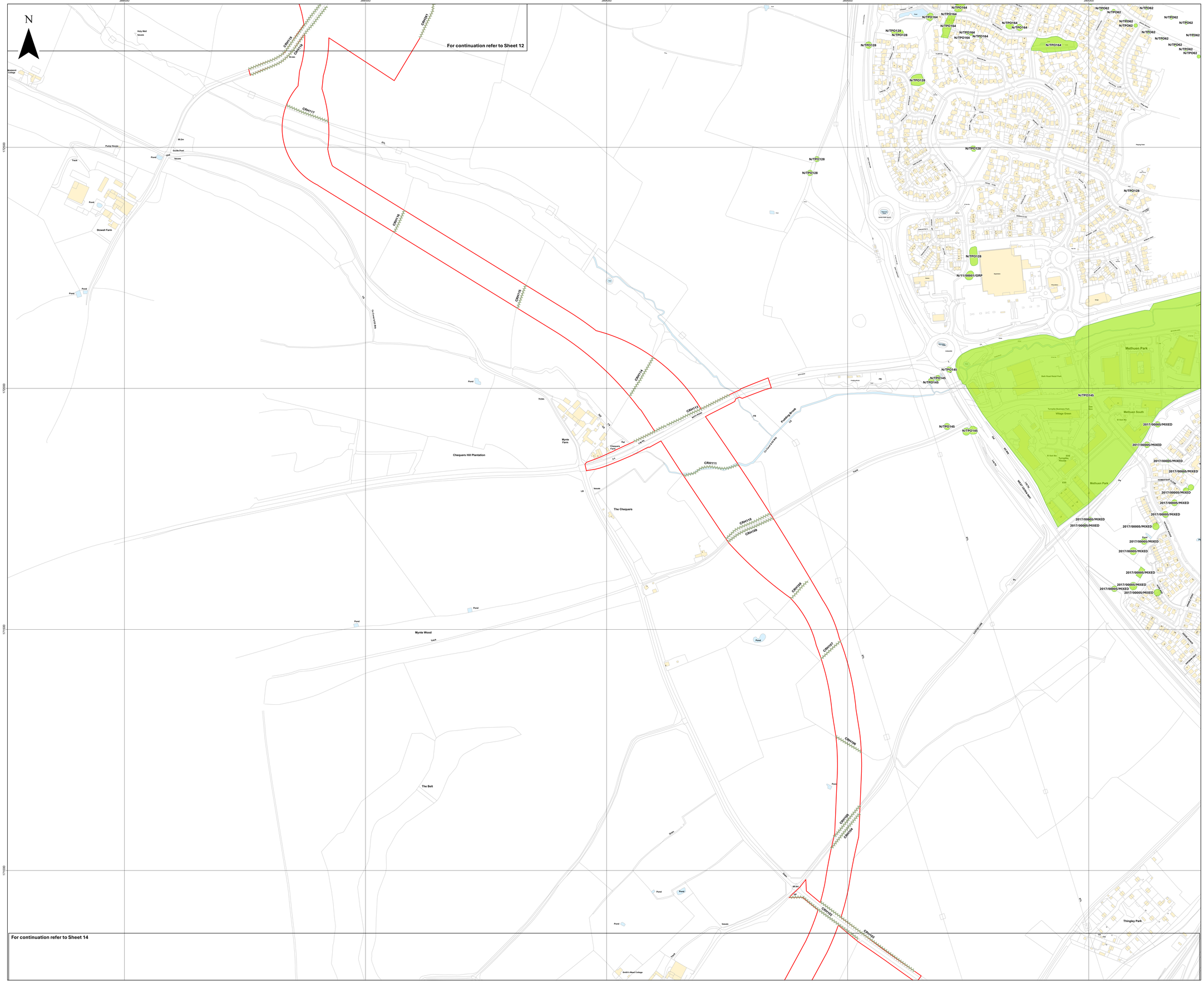
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APFP Regulation: 5(2)(o)	Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 12 of 23
Revision B

Lime Down Solar Park



Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height
- Tree Preservation Order (TPO)

Layers: Lanpro, 2026; IGP, 2026
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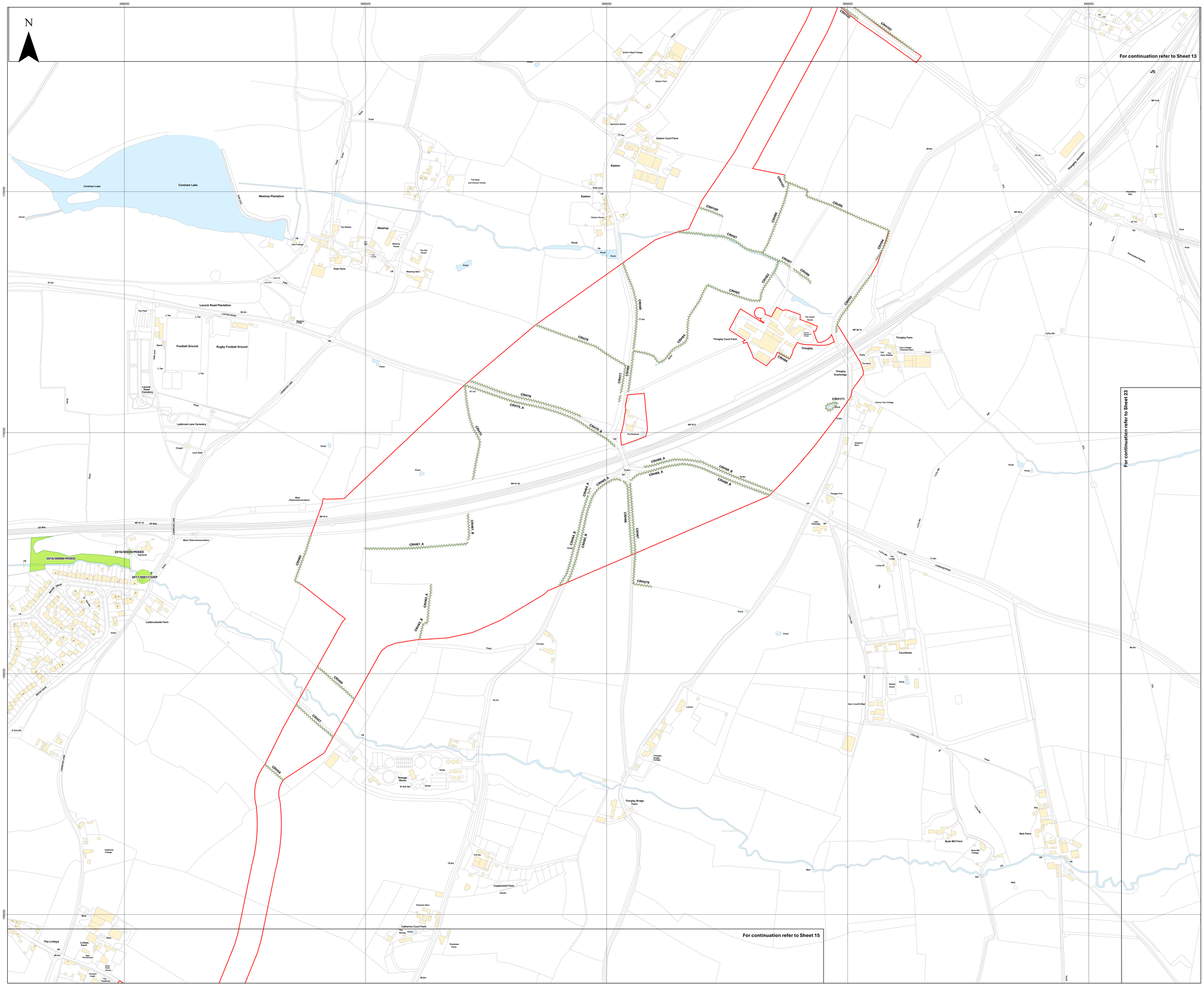
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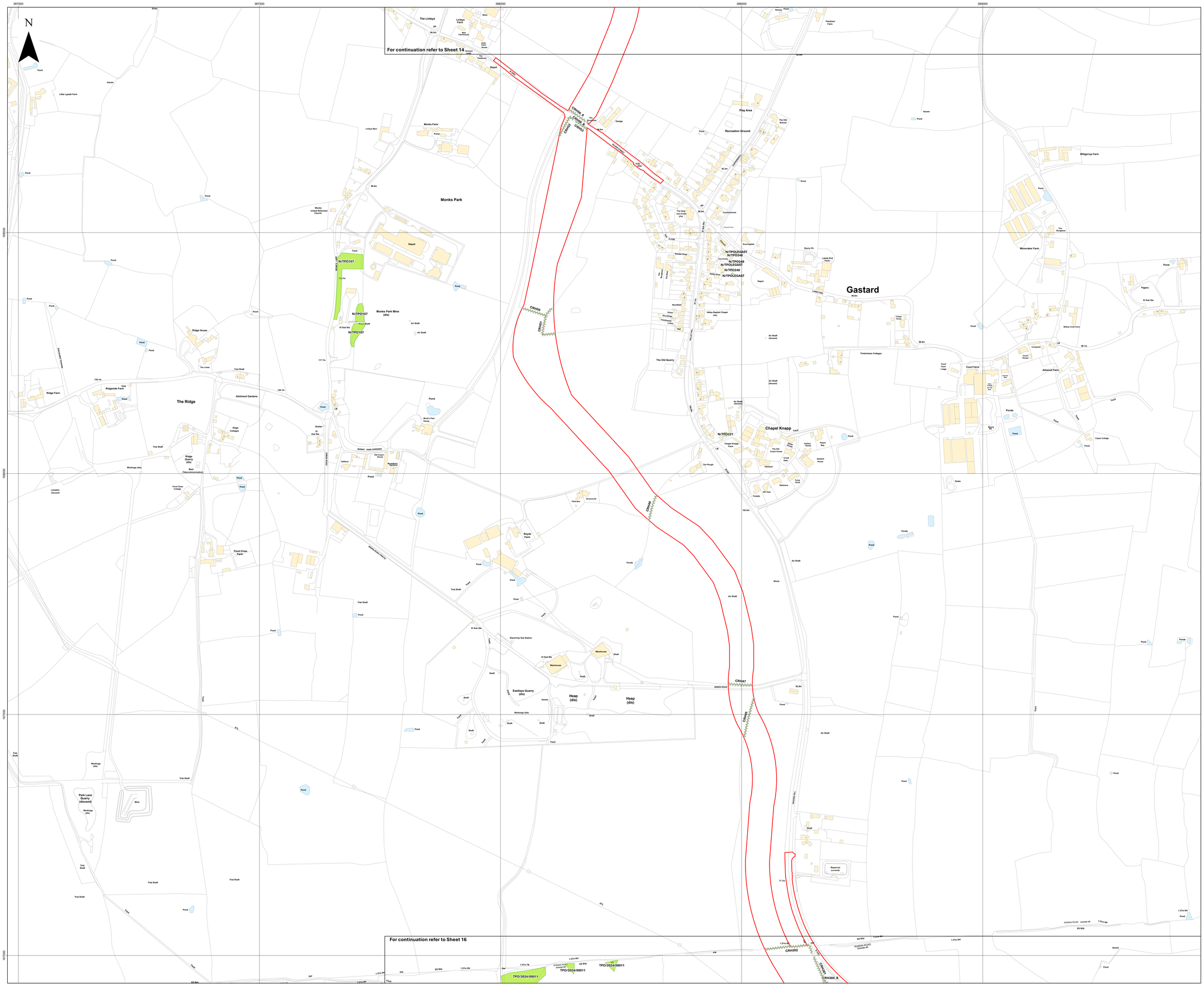
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

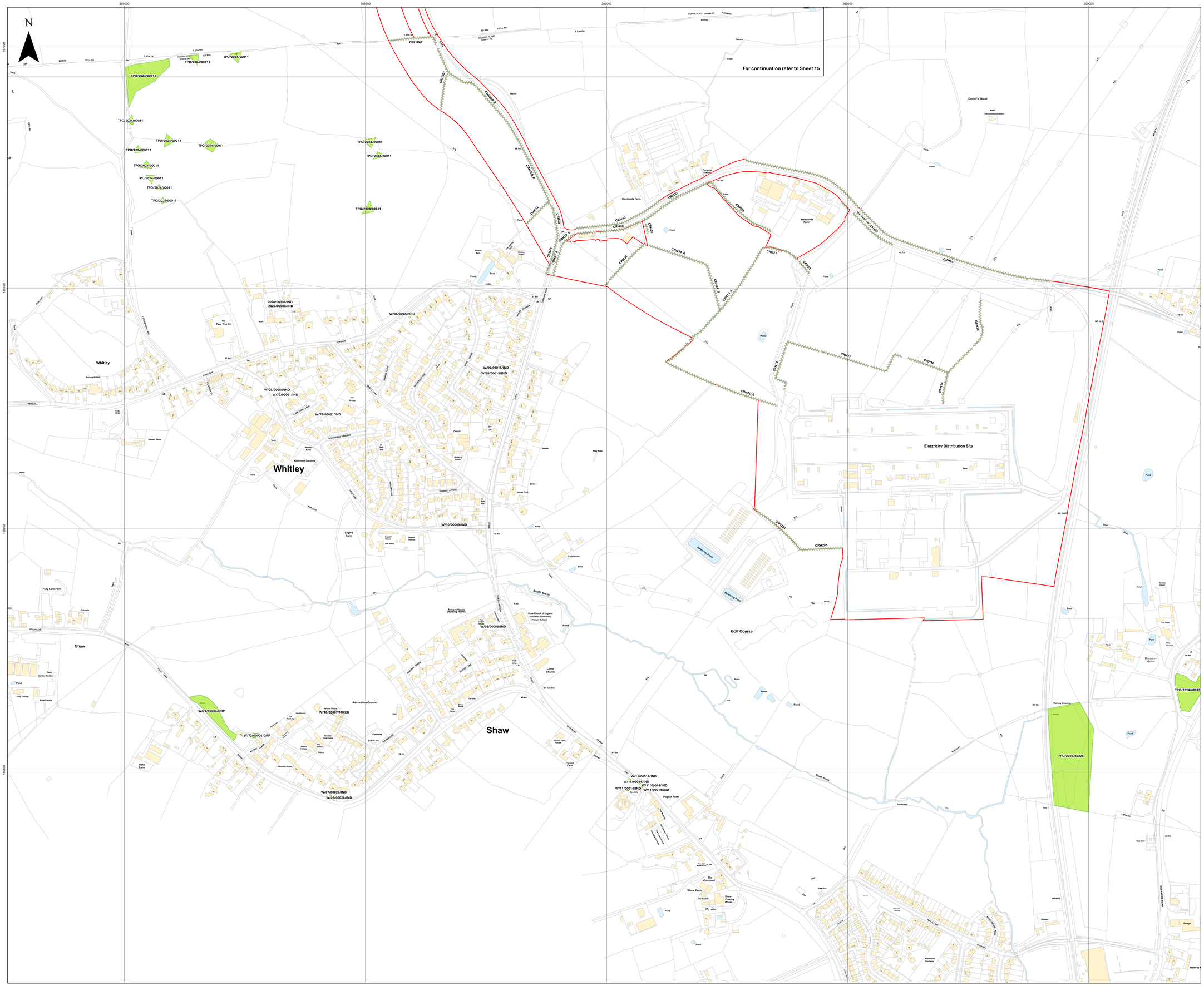
Hedgerow Height Plan

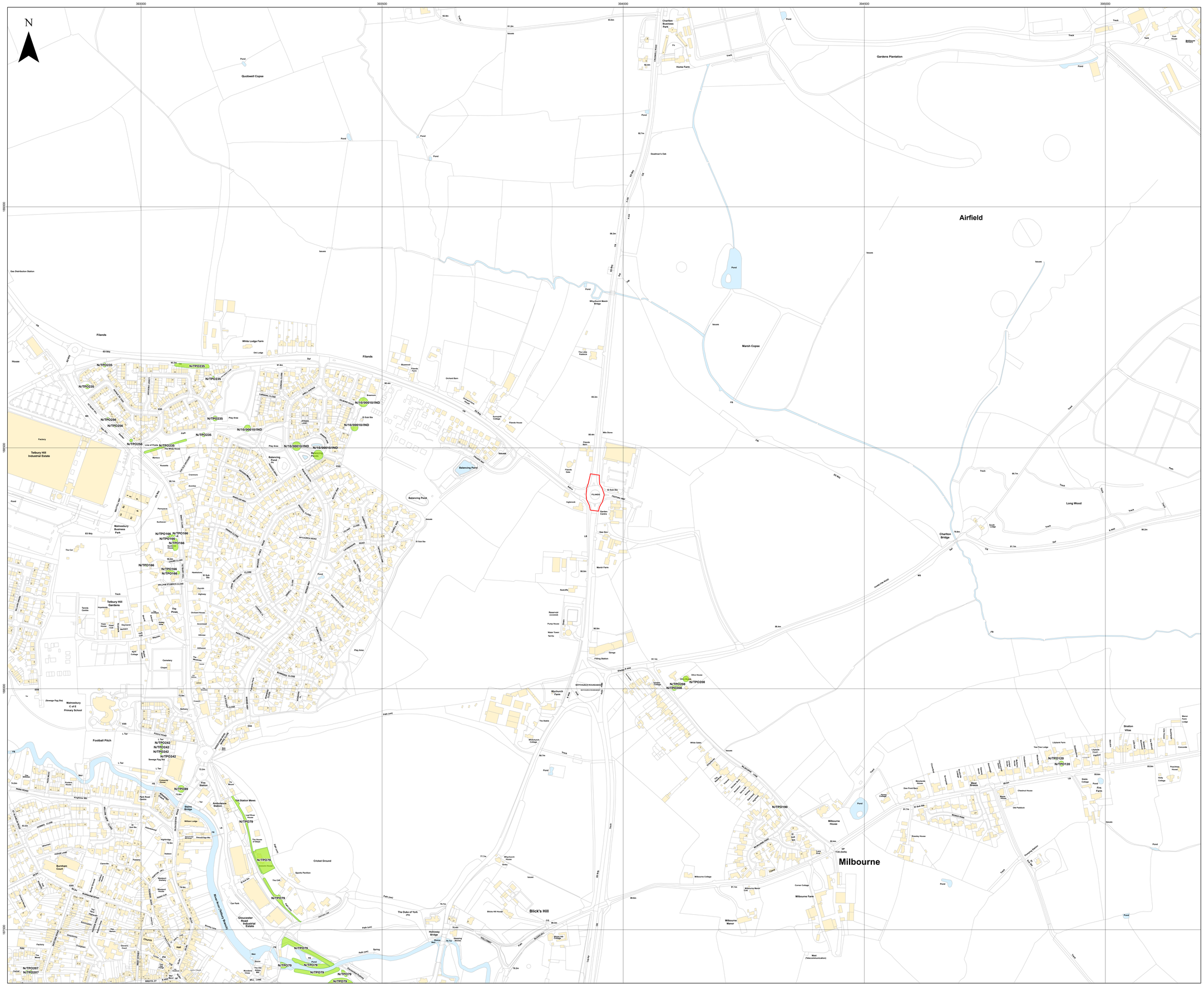
Sheet 13 of 23
Revision B

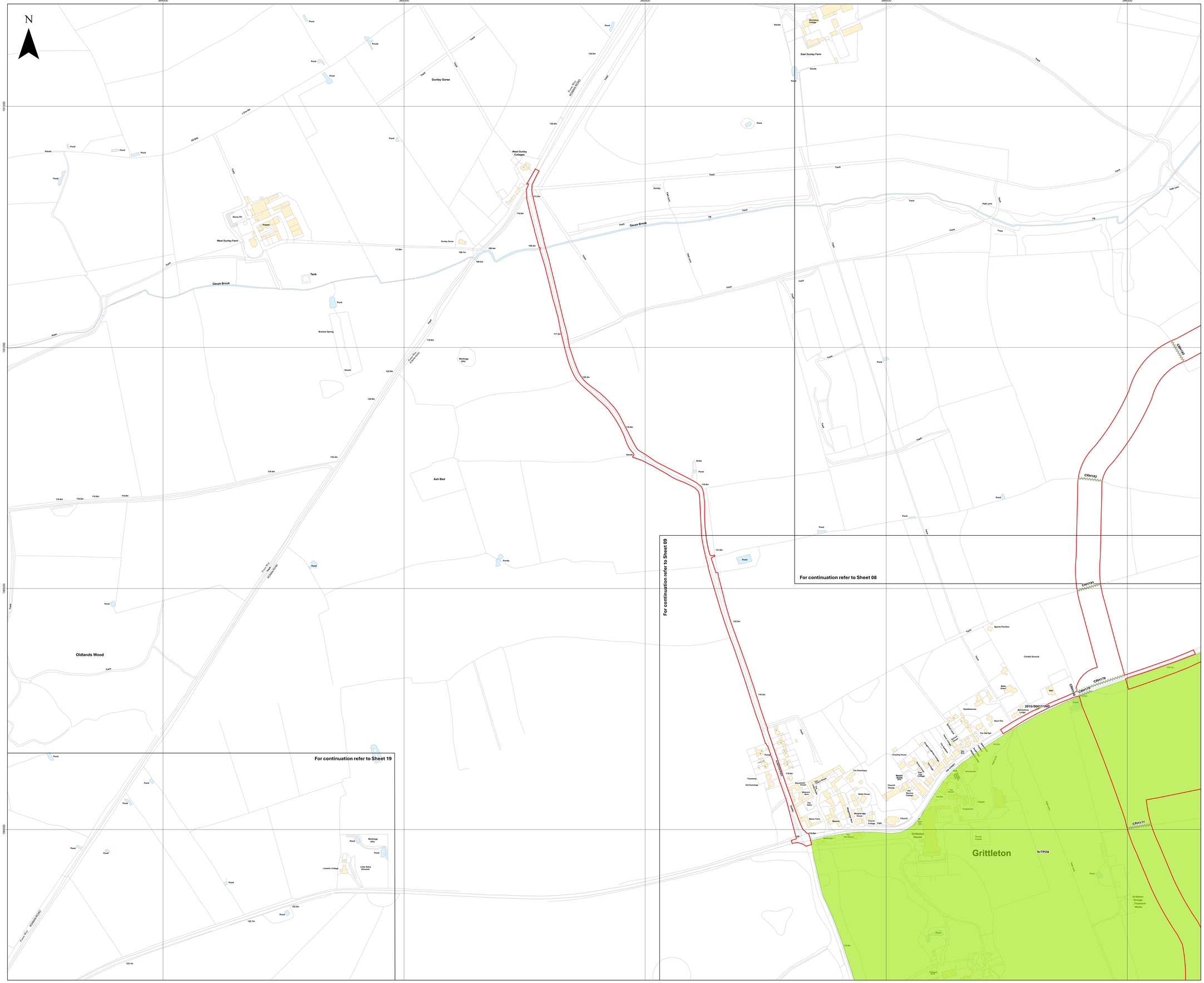
Lime Down Solar Park


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For continuation refer to Sheet 13
For continuation refer to Sheet 23
For continuation refer to Sheet 15
Corsham Lake
Westrop Plantation
Westrop
Park Farm
Lacock Road Plantation
Football Ground
Rugby Football Ground
Ladbrook Lane Cemetery
Ladbrookside Farm
Easton
Easton Court Farm
Thingley
Thingley Court Farm
Thingley Farm
Thingley Junction
Courtlands
Thingley Bridge Farm
Coppershell Farm
Byde Mill Farm
The Linleys
Hazlehurst Cottage
2016/00009/MIXED
2017/00017/GRP
CRH1
CRH2
CRH3
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CRH5
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CRH7
CRH8
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For continuation refer to Sheet 14
For continuation refer to Sheet 16
Monks Park
Gastard
The Ridge
Monks Park Mine (dis)
Eastleys Quarry (dis)
Heap (dis)
Heap (dis)
Park Lane Quarry (disused)
Ridge Quarry (dis)
Limekiln (disused)
Chapel Knapp
Atwood Farm
Court Farm
Monks Farm
Depot
Recreation Ground
Play Area
Ridge House
Ridge Farm
Ridgeside Farm
Ridge Cottages
Allotment Gardens
Trial Shaft
Workings (dis)
Pond Close Cottage
Pond Close Farm
Boyds Farm
Eastleys Farm
Linleys Farm
Linleys Barn
Little Lyppatt Farm
Monks United Reformed Church
Valley Baptist Chapel (dis)
The Old Quarry
Timberhaese Cottages
Court Farm Lodge
Atwood Cottages
Moonraker Farm
Wilgemup Farm
Willow Croft Farm
Ponds
Reservoir (covered)
Warehouse
Electricity Sub Station
Tanks
Stone
Issues
Pond
Track
Shaft
Air Shaft
Mine
Trial Shaft
Workings (dis)
Adit
Spring
Sink
Tank
Culvert
Footpath
Bridleway
Byway
Road
Roman Road (Ackling Dyke)
Roman Road (Gravelled)
Roman Road (Ungravelled)
Monks Park Mine
Monks Park House
Shelter
Sub Station
Old Council Houses
Gallows
Workshop
Ridge Cottages
Ridgeside Farm
Ridge House
Ridge Farm
Pond Close Cottage
Pond Close Farm
Boyds Farm
Eastleys Farm
Linleys Farm
Linleys Barn
Little Lyppatt Farm
Monks United Reformed Church
Valley Baptist Chapel (dis)
Timberhaese Cottages
Court Farm Lodge
Atwood Cottages
Moonraker Farm
Wilgemup Farm
Willow Croft Farm
Ponds
Reservoir (covered)
Warehouse
Electricity Sub Station
Tanks
Stone
Issues
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Track
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Air Shaft
Mine
Trial Shaft
Workings (dis)
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Footpath
Bridleway
Road
Roman Road (Ackling Dyke)
Roman Road (Gravelled)
Roman Road (Ungravelled)
Monks Park Mine
Monks Park House
Shelter
Sub Station
Old Council Houses
Gallows
Workshop
Ridge Cottages
Ridgeside Farm
Ridge House
Ridge Farm
Pond Close Cottage
Pond Close Farm
Boyds Farm
Eastleys Farm
Linleys Farm
Linleys Barn
Little Lyppatt Farm
Monks United Reformed Church
Valley Baptist Chapel (dis)
Timberhaese Cottages
Court Farm Lodge
Atwood Cottages
Moonraker Farm
Wilgemup Farm
Willow Croft Farm
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Roman Road (Gravelled)
Roman Road (Ungravelled)
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CRH339


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For continuation refer to Sheet 15
Whitley
Shaw
Golf Course
Electricity Distribution Site
Daniel's Wood
Westlands Farm
Poplar Farm
Shaw Farm
Folly Lane Farm
Oaks Farm
Legard Farm
Recreation Ground
Play Area
Depot
Pumping Station
Shaw Church of England (voluntary controlled) Primary School
Christ Church
Whitley Farm
Allotment Gardens
Shaw Country House
Bowcroft Pond
Running Pond
South Brook
Railway Crossing
CRH302
CRH303
CRH303 A
CRH303 B
CRH304
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CRH307
CRH308
CRH309
CRH310
CRH311
CRH312
CRH313
CRH314
CRH315
CRH316
CRH317
CRH318
CRH319
CRH320 A
CRH320 B
CRH321
CRH322
CRH323
CRH324 A
CRH324 B
CRH325
CRH326
CRH327
CRH328
CRH329
CRH330
CRH331
CRH332
CRH333
CRH334
CRH335
CRH336
CRH337
CRH338
CRH339
CRH340
CRH341
CRH342
CRH343
CRH344
CRH285
TPO/2024/00011
TPO/2024/00015
TPO/2022/00326
W/08/00074/IND
W/08/00068/IND
W/72/00001/IND
W/72/00001/IND
W/99/00015/IND
W/99/00015/IND
W/10/00005/IND
W/03/00008/IND
W/72/00004/GRP
W/72/00004/GRP
W/10/00007/MIXED
W/11/00014/IND
W/11/00014/IND
W/11/00014/IND
W/11/00014/IND
W/11/00014/IND
W/07/00027/IND
W/07/00028/IND
2020/00008/IND
2020/00008/IND
Daniel's Wood
West (Telecommunication)
Pond
Tank
Drain
Track
Path
Ditch
Fence
Hedge
Tree
Pylons
Gas Gov
Garage
Stables
Allotments
Foxbridge
Shaw Country House
Old Manor
Bessacre Manor
Temple Court
The Barn
The Old Malthouse
The Courtyard
The Hayloft
The Granary
The Stables
The Old Coachhouse
The Rookery
Walnut Cottage
Lavender House
Church Farm House
Folly College
Solar Panels
Tank Garden Centre
Colombo
Nursery School
The Pear Tree Inn
Shale's Farm
Allotment Gardens
Meadow View
Orchard Close
Orchard Way
Meadow Way
Kennedy Avenue
Whitley Close
Whitley Lane
Folly Lane
West Hill
Church Lane
Shaw Lane
Bowcroft Road
Bessacre Road
Meadow Walk


393000
393500
394000
394500
395000
N
Airfield
Milbourne
Blick's Hill
Quobwell Copse
Gardens Plantation
Long Wood
Marsh Copse
Tetbury Hill Industrial Estate
Malmesbury Business Park
Gloucester Road Industrial Estate
Charlton Business Park
Home Farm
Deadman's Oak
Whytchurch Marsh Bridge
Charlton Bridge
Tetbury Hill Gardens
Malmesbury C of E Primary School
Football Pitch
Cricket Ground
Burnham Court
Filands
White Lodge Farm
Gas Distribution Station
Sewage Pig Std
Fire Station
Ambulance Station
Sports Pavilion
Car Park
Play Area
Balancing Pond
Balancing Ponds
Filling Station
Garage
Garden Centre
Marsh Farm
Whytchurch Farm
Milbourne House
Milbourne Manor
Milbourne Farm
Corner Cottage
Milbourne College
Whytchurch Cottage
Whytchurch Roundabout
Charlton Road
Malmesbury Road
Gloucester Road
Park Road
Church Street
Cemetery
Chapel
Recreation Ground
Sewage Pig Std
Pond
Track
Footpath
Bridleway
Byway Open to All Traffic
Restricted Byway
Public Right of Way
Order Limits
Tree Preservation Order (TPO)
N/TPO235
N/TPO256
N/TPO166
N/TPO242
N/TPO59
N/TPO79
N/TPO207
N/TPO208
N/TPO190
N/TPO120
N/10/00010/IND
N/10/00018/IND
Line of Pollards
The White House
The Old Mill
The Old Forge
The House of Stage
Old Station Mews
Old Rose House
Bramleigh
Bramleigh Cottage
Orchard Barn
Bluewood
Sunnyhill Cottage
Floods House
Floods Barn
Floods Gate
Floods Farm
Ingleneuk
Rudcliffe
Reservoir (covered)
Pump House
Water Tower Tel Ex
Old Pastures
Chestnut House
Dew Pond Barn
Rosebay House
Meadowside House
Lilybank Farm
Yew Tree Lodge
Lilybank Guest Cottage
Lilybank Cottage
Stratton Villas
Manor Farm Lodge
Concourse
Peachtree House
Holly Cottage
Double Cottage
Fire Farm
Wheat Breeze
Marsh Farm
Old Pastures
Rosebay Cottage
Milbourne House
Milbourne Manor Cott.
Corner Cottage
Milbourne Farm
Milbourne Manor
Mast (Telecommunication)
Whytchurch Farm
Whytchurch Cottage
Whytchurch Roundabout
Blicks Hill House
Blicks Hill Cottage
Holloway Bridge
Holloway Stones
The Duke of York (PH)
Car Park
Sports Pavilion
Play Area
Balancing Pond



Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed up to 4.5m height
- Tree Preservation Order (TPO)

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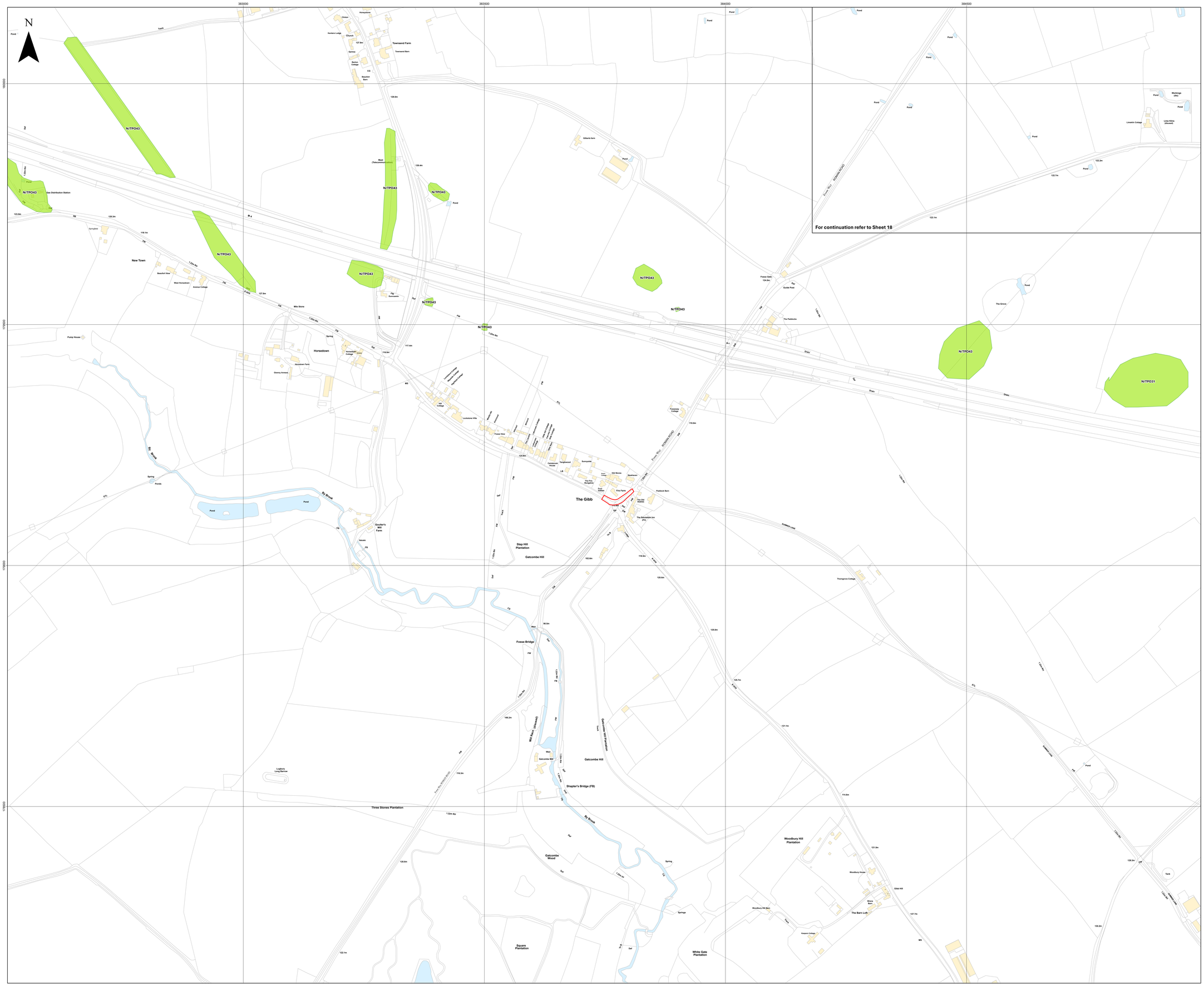
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

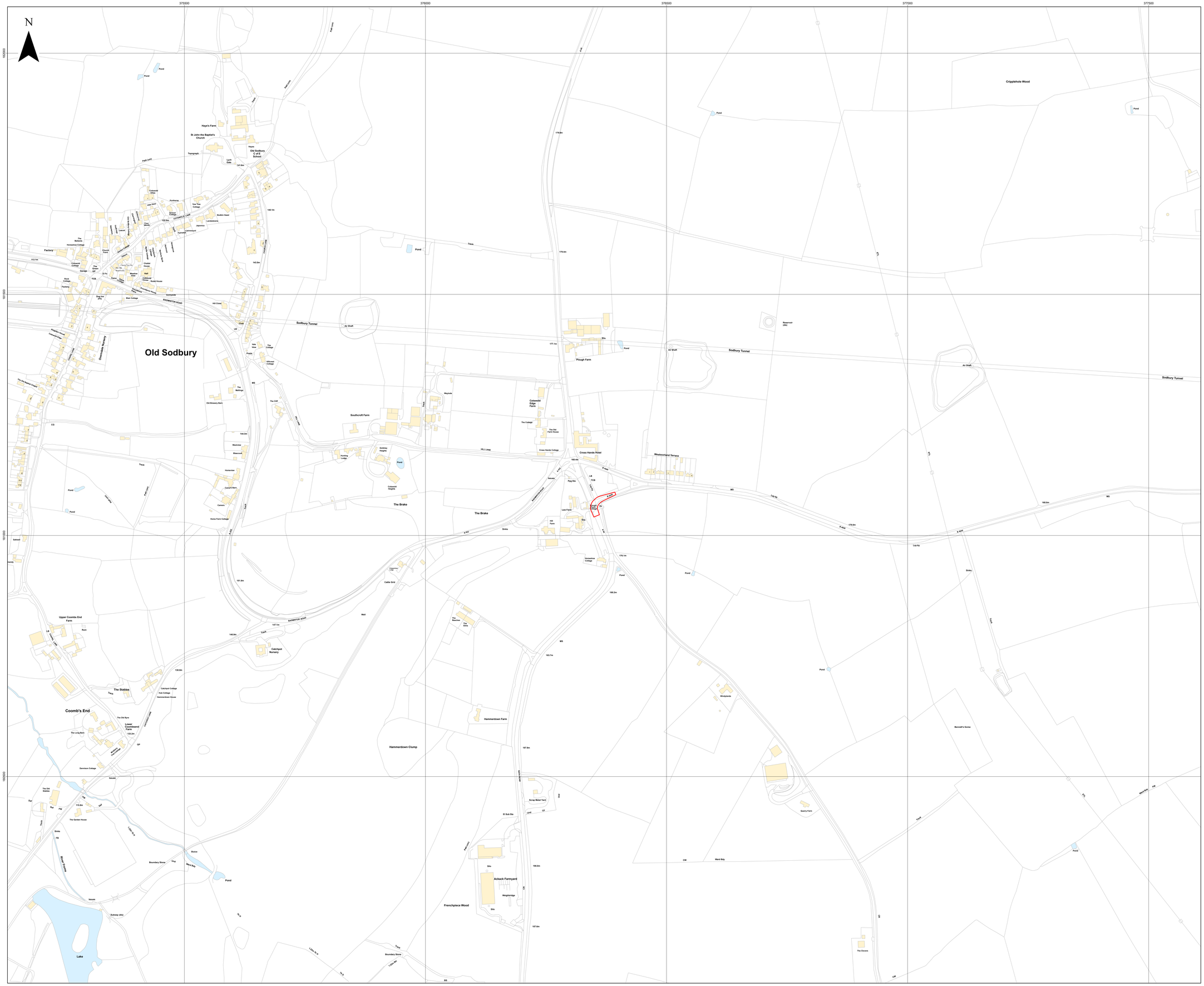
Hedgerow Height Plan

Sheet 18 of 23

Revision B

Lime Down Solar Park


383000
383500
384000
384500
N
N/TPO43
N/TPO31
For continuation refer to Sheet 18
New Town
Horsedown
Townsend Farm
Townsend Barn
Gatcombe Hill
Step Hill Plantation
Three Stones Plantation
Gatcombe Wood
Squars Plantation
White Gate Plantation
Woodbury Hill Plantation
The Gibb
Fosse Bridge
Shapter's Bridge (FB)
Mill Brook (Stream)
By Brook
Roman Road
Fosse Way
Gas Distribution Station
Pump House
Fire Farm
The Old Stables
The Salutation Inn (PH)
Paddock Barn
Thongrove Cottage
Woodbury House
The Barn Loft
Woodbury Hill Barn
Limekiln Cottage
Lime Kilns (disused)
Workings (disused)
The Grove
Gatcombe Mill
Gatcombe Hill Plantation
Ludbury Long Barrow
Ponds
Springs
Pond
Spring
Mast (Telecommunications)
Wire Stone
Granny Annexe
Horsedown Farm
Horsedown Cottage
Avenue Cottage
West Horsedown
Beaufort View
Beaufort Barn
Barton Cottage
Church
Chilton
Honeystone
Hutters Lodge
Garrow
Gilberts farm
Fossa Gate
Guide Post
The Paddocks
Lockstone Villa
Rose Villa
Fosse View
Lockstone Cottage
Newbury Cottage
Rose Cottage
Fosseway Cottage
Camberwell House
Tanglewood
Sunnydale
Four Gables
The Fire Bungalow
Old Stone
Newhaven
Step Hill Cottage
Gatcombe Hill Cottage
Thatch
Tank
Weir
Def
Quarry
Track
Ditch
Hedge
Fence
Wall
Bank
Path
Ford
Culvert
Bridge
Steps
Gate
Stile
Trees
Scrub
Orchard
Allotments
Cutting
Embankment
Level Crossing
Tunnel
Mast
Pylon
Overhead Line
Underground Cable
Electricity Substation
Telephone Kiosk
Post Box
Public House
Post Office
Shop
Church
Chapel
Village Hall
Sports Ground
Golf Course
Cricket Ground
Football Ground
Tennis Court
Bowling Green
Allotments
Cemetery
Recreation Ground
Playground
Car Park
Toilet
Information
Viewpoint
Picnic Site
Camping Site
Caravan Site
Youth Hostel
Hotel
Restaurant
Cafe
Pub
Museum
Theatre
Cinema
Library
Swimming Pool
Leisure Centre
Golf Course
Racecourse
Marina
Boat Yard
Slipway
Lighthouse
Coastguard
Lifeboat Station
Harbour
Pier
Jetty
Breakwater
Groyne
Sea Wall
Sea Defence
Flood Defence
Drainage
Culvert
Ford
Footbridge
Bridleway
Footpath
Byway
Restricted Byway
Permissive Path
Cycle Track
Long Distance Route
National Trail
Coast Path
Thames Path
Ridgeway
Offa's Dyke
Hadrian's Wall
Pennine Way
Cleveland Way
Yorkshire Dales
Lake District
Peak District
Snowdonia
Brecon Beacons
Pembrokeshire Coast
Exmoor
Dartmoor
New Forest
South Downs
North Downs
Chilterns
Cotswolds
Malvern Hills
Wye Valley
Forest of Dean
Shropshire Hills
Peak District National Park
Yorkshire Dales National Park
Lake District National Park
Snowdonia National Park
Brecon Beacons National Park
Pembrokeshire Coast National Park
Exmoor National Park
Dartmoor National Park
New Forest National Park
South Downs National Park
North Downs National Park
Chilterns National Park
Cotswolds National Park
Malvern Hills National Park
Wye Valley National Park
Forest of Dean National Park
Shropshire Hills National Park



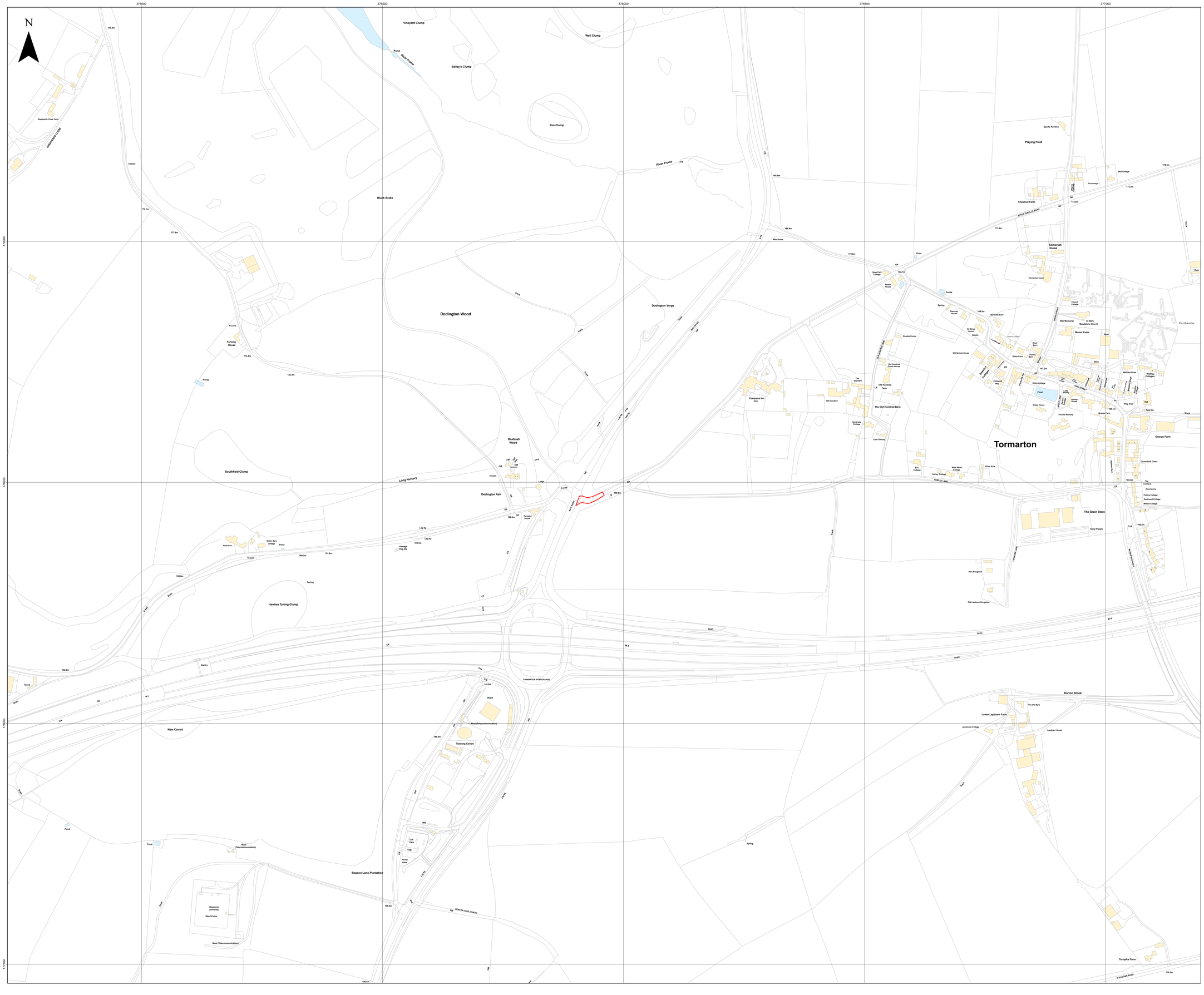
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 20 of 23

Revision B

Lime Down Solar Park



Island GREEN POWER

Lanpro

Key

- Order Limits

Layers: Lanpro, 2026; IGP, 2026

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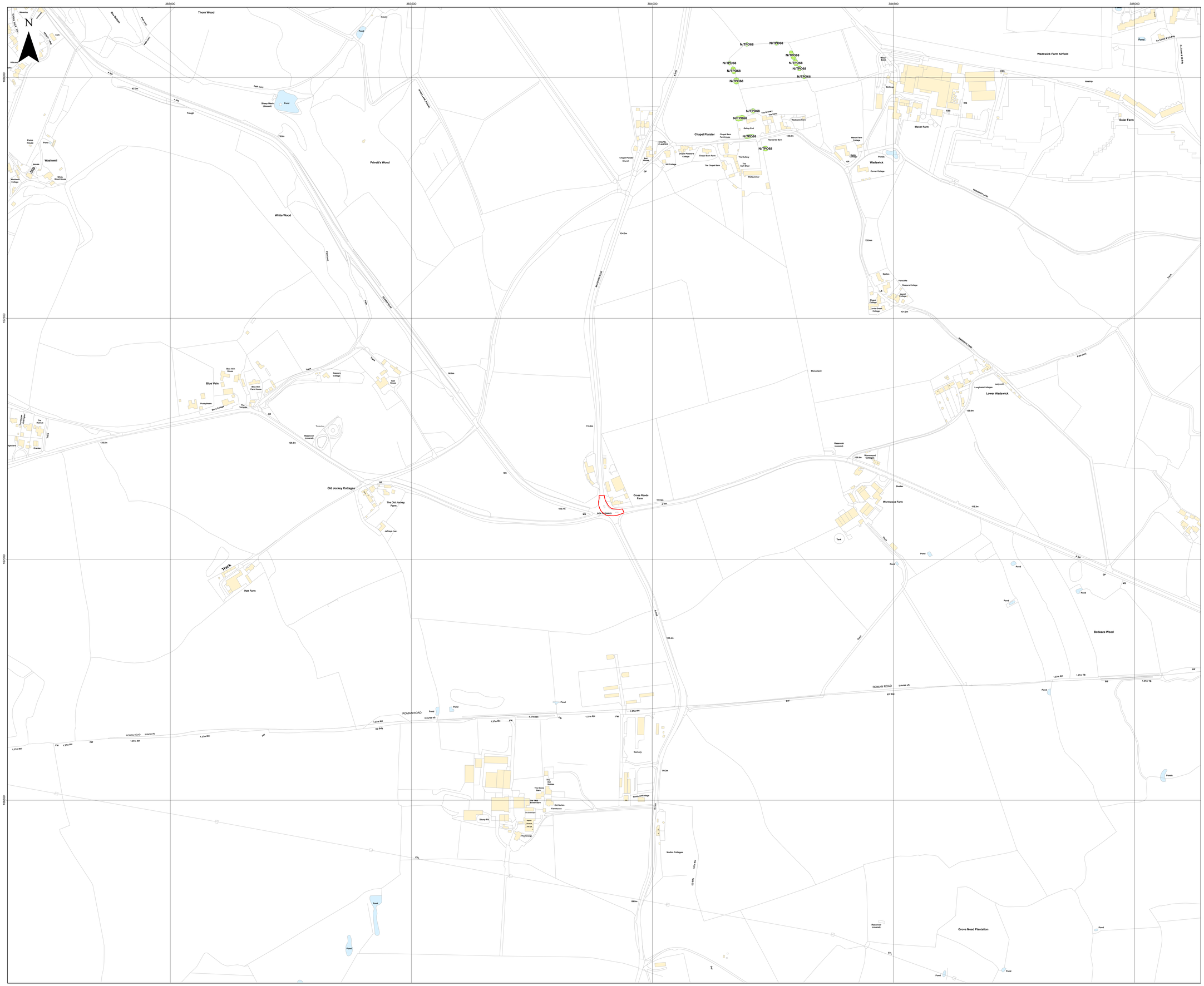
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 21 of 23

Revision B

Lime Down Solar Park



Island GREEN POWER

Lanpro

Key

- Order Limits
- Tree Preservation Order (TPO)

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Scale: 1:2,500@ A0

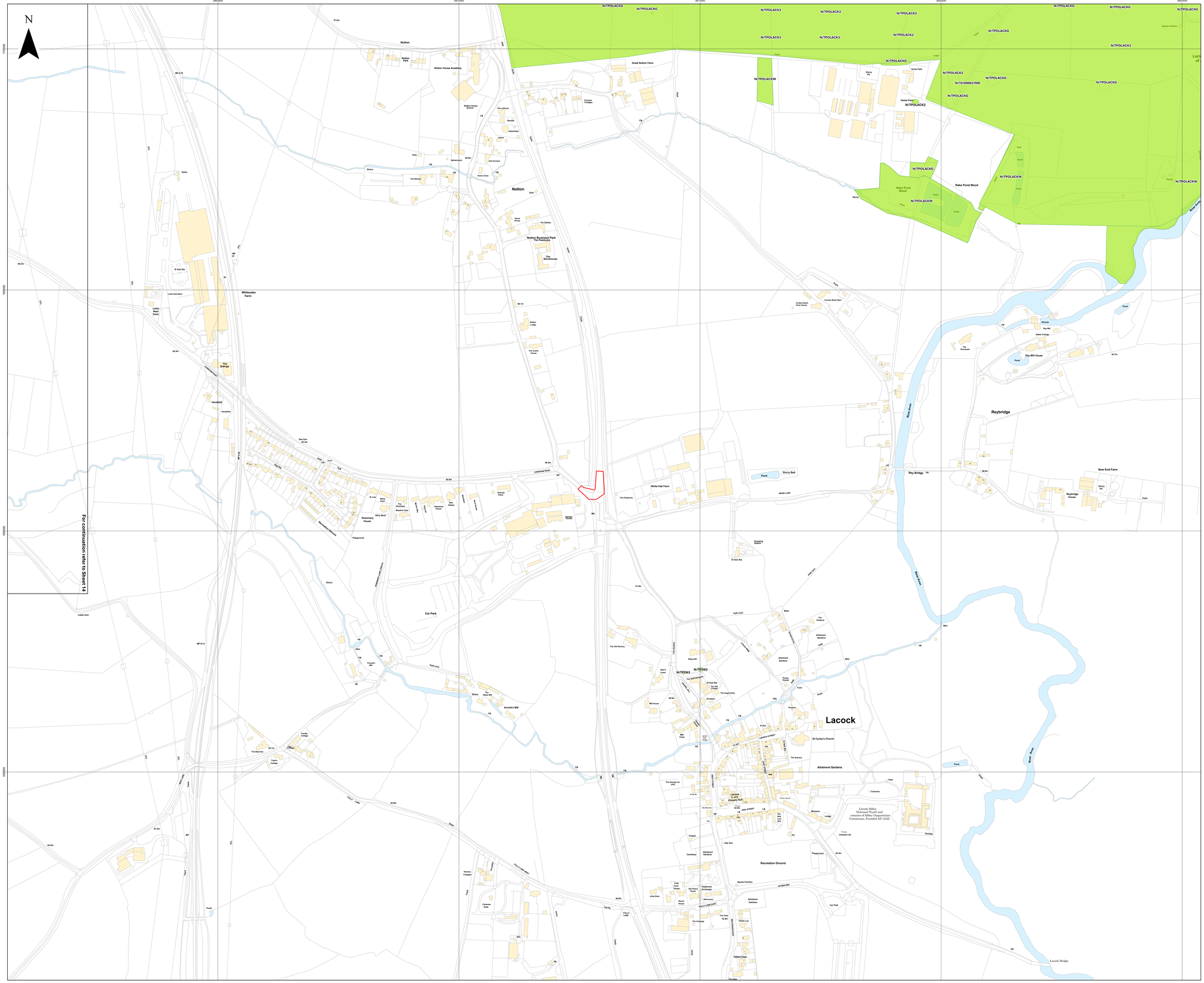
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 22 of 23

Revision B

Lime Down Solar Park



Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- Tree Preservation Order (TPO)

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0 100 200 300 Metres

Scale: 1:2,500@ A0

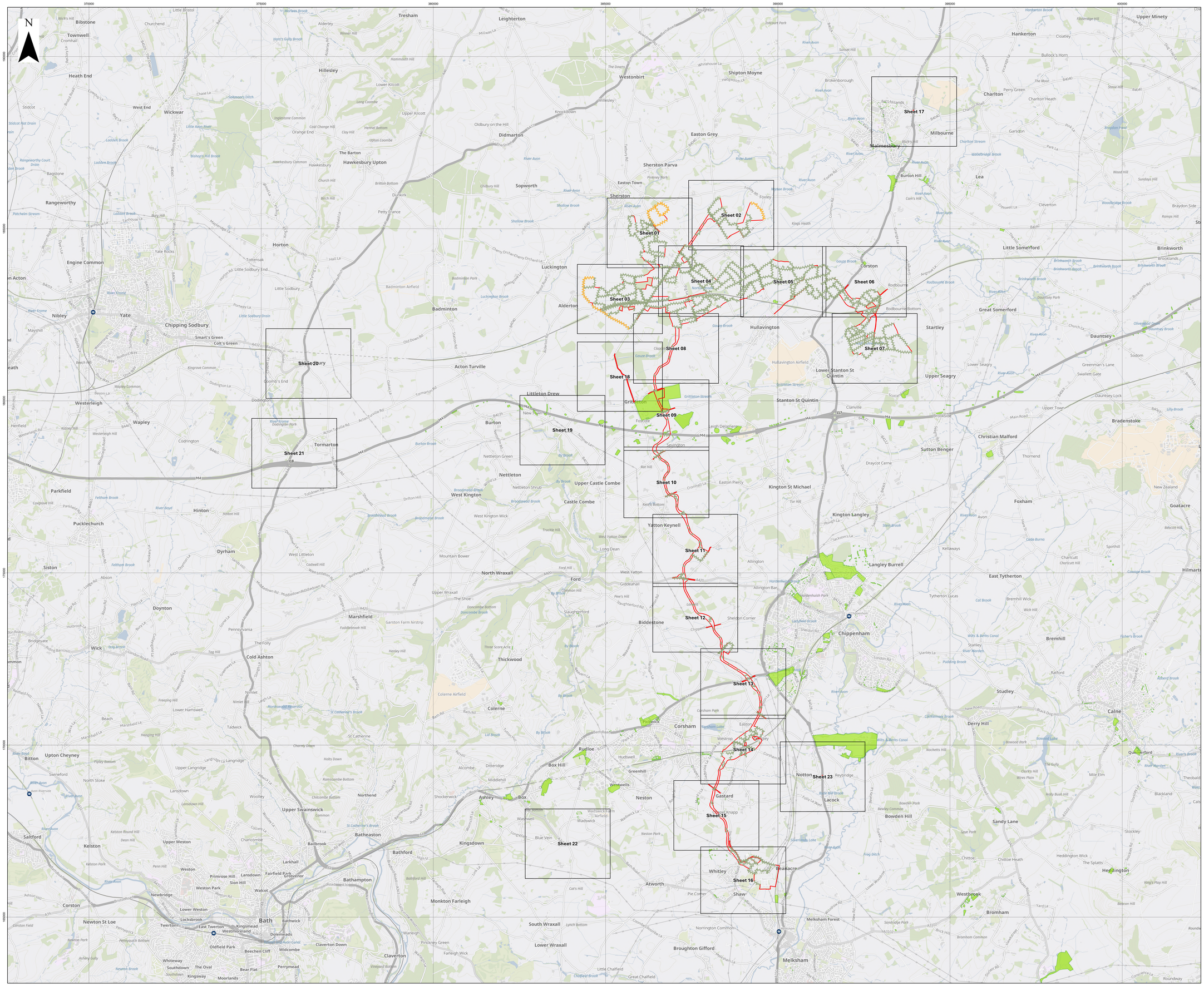
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 23 of 23

Revision B

Lime Down Solar Park



Island GREEN POWER

Lanpro

Key

- Order Limits
- Index Sheet
- Tree Preservation Order (TPO)
- Hedgerows to be managed up to 4.5m height
- Hedgerows to be managed at c1.5m (or as existing if greater)

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0 1 2 3 4 km

Scale: 1:35,000@ A0

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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 28/07/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Index Plan
Revision B

Lime Down Solar Park